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Rhode Island Energy™
a PPL company

May 7, 2024

VIA ELECTRONIC MAIL

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

RE: Docket No. 23-37-EL – The Narragansett Electric Company d/b/a Rhode Island Energy's Petition for Acceleration of a System Modification Due to Distributed Generation Project – Tiverton Project
Joint Rebuttal Testimony

Dear Ms. Massaro:

On behalf of The Narragansett Electric Company d/b/a Rhode Island Energy (the "Company"), enclosed please find the Company's joint pre-filed rebuttal testimony of Eric Wiesner and Ryan Constable in the above-referenced docket.

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

Sincerely,

Andrew S. Marcaccio

Enclosure

cc: Docket No. 23-37-EL Service List

JOINT REBUTTAL TESTIMONY

OF

RYAN CONSTABLE

AND

ERIC WIESNER

May 7, 2024

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I. Introduction

Eric Wiesner

Q. Mr. Wiesner, please state your name and business address.

A. My name is Eric Wiesner. My business address is 280 Melrose Street, Providence, Rhode Island 02907.

Q. Mr. Wiesner, by whom are you employed and in what position?

A. I am employed by The Narragansett Electric Company d/b/a Rhode Island Energy (the "Company" or "Rhode Island Energy" or "RIE") as the Director of Asset Management and Engineering. In my position, I am responsible for planning and oversight of projects and programs that ensure a safe and reliable electric distribution system.

Q. Mr. Wiesner, please describe your educational background and professional experience.

A. I received a Bachelor of Science degree in Electric Engineering from Virginia Polytechnic Institute and State University (Virginia Tech) in Blacksburg, Virginia, in 2009 and a Master of Engineering in Electrical and Computer Engineering from Worcester Polytechnic Institute in Worcester, Massachusetts, in 2015. I am a Registered Professional Engineer in Rhode Island, number 14219. I worked at American Power Conversion from 2009 to 2010, after which time I joined the National Grid Service Company ("NGSC").

From 2010 to 2012, I worked in the Distribution Design department supporting distribution line capital projects and programs. From 2012 to 2015, I worked in the Substation Engineering department supporting capital projects such as substation rebuilds, greenfield substations, and supporting responses to equipment failures. From 2015 to 2016, I joined General Dynamics Electric Boat as an Engineer supporting the electrical power system on various submarines. I returned to NGSC in 2016 and rejoined the Substation Engineering department performing the same type of work as I had performed from 2012 to 2015. From 2016 to 2020, I worked in the Substation Operations and Maintenance department as a field supervisor where I oversaw the day-to-day operations and maintenance of substations in Central Massachusetts. From 2020 to 2022, I rejoined the Substation Engineering department as the Manager where I oversaw the execution of substation capital projects and programs. In 2022, I joined Rhode Island Energy as the Regional Engineering Manager as described above and, on March 4, 2024, I became Director of Asset Management and Engineering.

Q. Have you previously testified before the Rhode Island Public Utilities Commission ("PUC")?

A. Yes. I have previously testified before the PUC in support of the Company's Fiscal Year ("FY") 2025 Electric Infrastructure Safety and Reliability ("ISR") Plan in Docket No. 23-48-EL.

Ryan Constable

Q. Mr. Constable, please state your name and business address.

A. My name is Ryan M. Constable. My business address is 280 Melrose Street, Providence, Rhode Island 02907.

Q. Mr. Constable, by whom are you employed and in what position?

A. I am employed by Rhode Island Energy as an Engineering Manager in the Distribution Planning and Asset Management Department. In my position, I am responsible for planning and oversight of projects and programs that ensure a safe and reliable electric distribution system.

Q. Mr. Constable, please describe your educational background and professional experience.

A. I received a Bachelor of Science degree in Electric Power Engineering from Rensselaer Polytechnic Institute in Troy, New York, in 1993 and a Certificate of Industrial Management and Power Engineering from Worcester Polytechnic Institute in Worcester, Massachusetts, in 2000. I am a Registered Professional Engineer in Massachusetts, number 41632. I worked at NGSC from 1994 to 2000 and again from 2010 to May 24, 2022, after which time I joined Rhode Island Energy in my current position.

I have held various positions of increasing responsibility in the area of Distribution Planning. From 1994 to 1998, I was a Project Engineer responsible for the design and maintenance of the electric infrastructure serving commercial and residential customers in southeastern Massachusetts. During the period from 1998 to 2000, I was a Planning Engineer conducting long-range electric system studies. From 2010 to 2011, I worked as a Principal Engineer in the Utility of the Future department developing the Worcester Smart Energy Solution Pilot. In 2011, I became the Manager of Distribution Planning and Asset Management – New England, directing a ten-person team to conduct annual planning activities, perform long-range planning studies, and develop regulatory filings. In 2017, I became the Acting Director of that department.

From 2000 to 2010, I worked for three independent transmission development companies, TransEnergie U.S., Cross Sound Cable Company, and Brookfield Renewable Power.

Q. Have you previously testified before the PUC?

A. Yes. I have previously testified before the PUC in support of the Company's FY 2025 Electric ISR Plan in Docket No. 23-48-EL; FY 2024 Electric ISR Plan in Docket No. 22-53-EL; FY 2023 Electric ISR Plan in Docket No. 5209; FY 2022 Electric ISR Plan in Docket No. 5098; and the Company's FY 2020 and FY 2023 Electric ISR Plan

Reconciliation Filings. I have also participated in technical sessions as part of Docket No. 23-34-EL (ISR Planning and Budget Processes).

II. Purpose and Structure of Joint Reply Testimony

Q. What is the purpose of this testimony?

A. The purpose of this testimony is for the Company to respond to the following filings that were submitted in this proceeding: (i) Pre-filed direct testimony of Gregory L. Booth, PE on behalf of the Division of Public Utilities and Carriers ("Division") submitted on April 10, 2024; and (ii) Pre-filed direct testimony of Mathew Ursillo on behalf of Green Development, LLC ("Green") submitted on April 10, 2024.

Q. How is this testimony structured?

A. This testimony is broken up by topic. Specifically, through this testimony, the Company responds to the following topics:

- Tariff Application (Section III)
- Tiverton Area Study (Section IV)
- ISR Materials (Section V)
- Conclusion (Section VI)

III. Tariff Application

Q. Why should the PUC reject Mr. Booth's narrow interpretation of Section 5.4 of RIPUC No. 2258 entitled The Narragansett Electric Company Standards for Connecting Distributed Generation ("Interconnection Tariff" or "Tariff")?

A. As explained in this rebuttal testimony, the intent of the Interconnection Tariff is to align with the scope and duration of the Company's distribution work plan and, from a practical standpoint, it would be challenging to identify a significant distributed generation ("DG") project that could be fully installed within five years from the start of an Impact Study.

Q. What is the rationale behind the five-year look forward period referenced in Section 5.4 of the Interconnection Tariff?

A. The applicable statute, R.I. Gen. Laws § 39-26.3-4.1 (the "Interconnecting Statute"), is silent as to the timeframe over which a System Modification[1] might be considered accelerated. The rationale behind the five-year look forward period in the Interconnection Tariff is to set a timeframe that aligns with the scope and duration of the Company's distribution work plan, which at the time the acceleration provisions were incorporated into the Tariff, was five years. The Company notes that it now provides a 10-Year Long Range Plan.

[1] The Interconnecting Statute references a System Modification "benefiting other customers." A System Modification that "benefits other customers" can be considered a System Improvement as defined by the Tariff.

Q. What is the Company's basis for the rationale described above?

A. In Docket No. 4763, the Company responded to a record request issued by the PUC stating that the look forward period is five years from the date the impact study begins "to align with the Company's distribution work plan."[2] Emphasis added.

Q. Does the Company consider the Accelerated Modification[3] that is the subject of the Petition[4] to be aligned with the Company's distribution work plan? If so, please explain why.

A. Yes. As explained in the Company's response to Division 2-11, the Company views the construction of a dedicated circuit (33F6) out of the Tiverton Substation and the installation of approximately 21,000 feet of a manhole and duct system with 3 conductor 1000 kcmil SCU EPR cable (the "Tiverton Work") as an Accelerated Modification that was anticipated and continues to be needed within the FY 2024 through FY 2029 period as identified in the Tiverton Area Study. The Tiverton Area Study was initially performed in September 2021, and revised in September 2022. The Area Study's identified spend for the Tiverton Work is over the timeframe of FY 2024 though FY 2029. The Company

[2] See the Company's response to Record Request No. 5 in Docket No. 4763. https://ripuc.ri.gov/sites/g/files/xkgbur841/files/eventsactions/docket/4763-NGrid-RR%282-23-18%29.pdf

[3] The Company will consider a System Modification to be an "Accelerated Modification" if such modification is otherwise identified in the Company's work plan as a necessary capital investment to be installed within a five -year period as of the date the Company begins the impact study of the proposed distributed generation project.

[4] The Company's Petition for Acceleration of a System Modification Due to Distributed Generation Project – Tiverton dated October 17, 2023.

began Green's Impact Study in June 2019 (FY 2020) and approved spending stemming from the Tiverton Area Study began four years later, in FY 2024.

Q. Mr. Booth's opinion is that the Accelerated Modification does not need to be included in an ISR Plan for ten or more years. Hypothetically, if an investment were ten or more years out from being needed within an ISR Plan, would the Company consider it an Accelerated Modification?

A. As an initial matter, the Company does not agree with the Division's opinion regarding the need for the infrastructure that is being accelerated. The Tiverton Work was anticipated and continues to be needed within the FY 2024 though FY 2029 period as explained later in this testimony. However, if an investment is not needed for ten or more years, the Company agrees that the project would be outside of the Company's five-year plan, which is the basis for the acceleration provisions in the Interconnection Tariff, and would not be considered by the Company for reimbursement as an Accelerated Modification.

Q. What insights or observations has the Company obtained from its ongoing review of DG interconnections and associated study timelines?

A. Since the Interconnection Tariff was amended to effectuate the statutory acceleration provisions, the scope, scale, and timelines for interconnections have become more complex both at state and federal levels. Accordingly, the Company looks at the

surrounding circumstances of each project and the intent of the Interconnection Tariff and Interconnection Statute to determine whether to petition the PUC for reimbursement to the DG developer of an Accelerated Modification.

The interconnection study process for sites similar to Green's site considered in this Petition can span many years. (In this case, it is four years). ISO-NE's Affected System Operator ("ASO") process can create similar timelines. Furthermore, the planning and full construction of projects identified within area studies can span many years considering the study time, the process time to introduce and request approval with an ISR Plan, and the practical design, procurement, and resourcing times.

As a result of timelines not contemplated during the development of the Interconnection Tariff, the Company notes a substantial conflict with a narrow interpretation of the Tariff and the intent of the Interconnection Statute. A narrow interpretation of the Tariff may result in limited to no opportunity for shared cost under the statutory acceleration provisions, which is inefficient for distribution planning and infrastructure construction that may be beneficial to both distribution customers and interconnecting customers.

The Company offers these specific observations for Green's 11,791 kW photovoltaic systems located at 390 Brayton Road, Tiverton, RI 02878 (the "Tiverton Project"):

1. The Tiverton Area Study was started during the Impact Study process, approximately two years after start, and prior to Interconnection Services Agreement ("ISA") execution.
2. The Tiverton Area Study substantially finished prior to the execution of the first version of the ISA.
3. The Tiverton Area Study identified a number of system issues with variable timing from immediate to forecasted.
4. Regardless of system issue timelines, the Study recommendation must consider regulatory and practical project execution timelines.
5. Considering regulatory and practical project execution timelines, the Study recommendation would have started near DG interconnection finish and the Study recommendation would have finished within five years of the DG interconnection finish.
6. The system and customers will benefit from electrical facilities installed by the Tiverton Project well within five years from interconnection.

IV. Tiverton Area Study

Q. What is the purpose of an area study?

A. Area studies are detailed and comprehensive reviews of various regions throughout the Company's' service territory. Significant work goes into developing each area study. The studies typically address issues in a 10- to 15-year window and typically start five to seven years after the last study was completed. The studies may be prompted by findings exceeding the Company's planning criteria, asset condition issues, large new customer load requests, or acute reliability issues. To date, the Company has completed all 11 Rhode Island area studies and reviewed results with the Division.

Q. Is the process Mr. Booth described in his testimony to essentially invalidate the Tiverton Area Study concerning?

A. Yes. There are a number of misinterpretations and contradictions that are concerning. The Tiverton Area Study was a comprehensive and detailed study that took approximately 10 months to complete and was completed by engineering in consultation with operations personnel. Mr. Booth indicated that he "used the Company's Tiverton Area Study assumptions to assess the actual need and timing of the system improvement that is the subject of the Petition." In doing so, he incorrectly interpreted and dismissed important factors as explained in the testimony below. Mr. Booth also indicated that the Tiverton Area Study "is premised on the fact that the DG Customer is going to interconnect; therefore, the Company does not have an Area Study including the base

case for Tiverton system improvements that assumes the DG customer does not exist." That statement is misleading as explained in the testimony herein.

Q. Were the Tiverton Area Study recommendations reviewed by the Division?

A. Yes. The Division's claim that the Tiverton Area Study recommendations are suddenly unnecessary is contrary to other communications with and statements by the Division. Mr. Booth notes the "recently delivered Long-Range Plan in the FY 2025 ISR Plan filing." and attempts to use that statement to imply that the Tiverton study recommendations are new and are not approved. This is misleading. The Division reviewed the Tiverton Area Study in May of 2021 and made no comments regarding the analysis or recommendations. The Division also supported the inclusion of the Tiverton 33F6 feeder in the FY 2024 and FY 2025 ISR Plan filings.

Q. From a needs standpoint, is the Tiverton Area Study premised on the fact that Green is going to connect its Tiverton DG Project?

A. No. From a needs standpoint (as opposed to a solution scope standpoint), the Tiverton Area Study is not premised on the fact that Green is going to connect its 11,791 kW photovoltaic systems located at 390 Brayton Road, Tiverton, RI 02878.

Mr. Booth states that "[t]he Area Study is premised on the fact that the DG Customer is going to interconnect; therefore, the Company does not have an Area Study including the

base case for Tiverton system improvements that assumes the DG Customer does not exist." This statement is incorrect. First, in Section 3.2, the Area Study notes "[t]he study analysis considered both the scenario in which these in-queue projects do not proceed, and the scenario in which they do interconnect. Whether or not they proceed will not affect the plan recommendations, although one DG project, 11.8MW, would overlap with some of the plan recommendations (as further discussed in section 5.1)." In Section 6.1 the Study notes "[i]f the DG project does not proceed, this 33F6 circuit will still be needed to address the area contingency loading concerns."

Q. Did Green's Tiverton Project create the need identified in the Tiverton Area Study?

A. No, Green's Tiverton Project did not create the need identified in the Tiverton Area Study. As is common practice, the system was evaluated by including all connected DG and by running multiple simulations with and without the in-queue DG projects. The system was evaluated with and without Green's Tiverton Project and the thermal, voltage, contingency and reliability concerns were present in both models.

Q. From a solution standpoint, is Mr. Booth's opinion valid that the DG project be left out of the scope?

A. No. As indicated above, the 33F6 circuit is needed whether or not Green's DG project is interconnected. The feeder identified in the Area Study would have run through the same area as Green's DG Project regardless of whether the DG Project existed or not.

Therefore, given the circuit is needed and runs through the same area as the DG Project, it is reasonable that the scope of the solution takes into consideration Green's DG Project, provided that Green pays the difference between the overhead and underground cable.

The Area Study describes the DG interconnection scope. The scope was appropriate as the interconnection was in design during finalization of the Study and there would be no way to establish the feeder to serve system needs in a different way. However, the hypothetical scope to install the new feeder without the DG interconnection was explained to the Division during the May 2021 presentation. The Division suggests that the DG scope within the Study was inappropriate when it was indeed fact and the only appropriate way to describe the scope. The only material difference in solution cost was the difference between overhead and underground cable which Green is paying for.

Q. Why should Mr. Booth's opinion that the Tiverton Work would not go into an ISR Plan for ten or more years be dismissed?

A. Mr. Booth says "[f]rom an engineering and ISR Plan perspective, it is more likely than not that the 33F6 circuit addition to solve the voltage, load and reliability issues identified by the Company in its Area Study will not be incorporated into an ISR Plan for ten years and possibly even longer." This opinion should be dismissed because the 33F6 circuit addition will be incorporated into an ISR Plan in less than ten years as it has already been incorporated into the approved FY 2024 and FY 2025 ISR Plans.

Q. Why should Mr. Booth's reanalysis of the Tiverton Area Study be dismissed?

A. Mr. Booth's reanalysis is fundamentally flawed and not comprehensive. He selectively decides what engineering analysis is important and creates a new prioritization method that is arbitrary and is not appropriate in this docket. Mr. Booth claims he used the CYME model to address all voltage and loading violations. The Division requested a number of CYME models with attempts to find a lower load level without considering the full load picture. For instance, the 2023 load levels were low. However, the peak was in September and should be used with caution. A similar case occurred during the 2014 and 2015 summer peaks, which were also low and the Company did not adjust the work plan. This was proven appropriate as the 2016 summer was a hot summer with a high peak load. This event occurred during Mr. Booth's time reviewing the yearly ISR Plans and the Division and Mr. Booth raised no comments and were seemingly unaware. The Company is not claiming the Division or Mr. Booth should be involved in the nuances of forecasting, but this is an example that demonstrates how they are typically unaware of these details. Mr. Booth's reliability analysis is also contrary to previous statements. Mr. Booth states "[t]his circuit can be remediated by a series of lower cost options instead of constructing a new circuit at a cost of over $15 million." However, there is no reliability analysis to his claims. He adds that the reliability issues "can be mitigated with Trip Savers (cutout mounted reclosers, or CMR), enhanced by vegetation management, animal guards and added sectionalizing such as circuit reclosers" which may be a misinterpretation of area study recommendations. Mr. Booth is aware and has

commented that certain recloser schemes can be limited by small conductors and highly loaded areas. That is exactly the issue in the Tiverton area, yet that concept is ignored. Therefore, Mr. Booth's conclusion that reclosers associated with the CEMI-4 program without the new feeder would address the reliability concerns is false by his own claims. The Company does plan to install reclosers with the new feeder as part of its normal course of business. The reclosers will not solve all the issues unless the new feeder is installed.

Finally, Mr. Booth's dismissal of contingency concerns is arbitrary. He states "[i]n addition, the N-1 exposure at Tiverton should be lower relative to the time the Area Study was performed since loads have been decreasing." Mr. Booth has conducted no contingency analysis directly to verify his statements. He uses the responses to DIV 5-1 in Docket 5209 and the response to DIV 3-2 in this docket to inappropriately develop a new prioritization method. The load at risk issues described in DIV 5-1 in Docket 5209 are all addressed by projects currently included in the ISR Plan. The load at risk issues described in the response to DIV 3-2 includes notes to explain why they currently do not have a solution. Most are associated with complex multi-year projects where the Company is appropriately waiting for the major construction to progress such that a new analysis is warranted. Mr. Booth ignores this important point to incorrectly conclude that contingency load at risk issues can be deprioritized.

Q. Has the Company changed its position on the Tiverton Area Study since its response to DIV 5-1 in Docket No. 5209?

A. No. There is no change to the Company's position on the Tiverton Area Study as explained in its response to DIV 5-1 in Docket No. 5209.

Q. Could you summarize the needs contained within the Tiverton Area Study?

A. The Tiverton Area Study was provided in this docket as Exhibit EJRS-3 attached to the Pre-Filed Joint Testimony of Erica Russell Salk & Stephanie A. Briggs. Sections 5.1.1 Normal Configuration – Thermal Loading, 5.1.2 Contingency Configuration – Thermal Loading, 5.2 Voltage Performance, and 5.4.1 Reliability Performance describe the needs identified within the study. A summary is presented below.

- **Normal Configuration – Thermal Loading:**
  - 1 of 4 circuits is predicted to be overloaded 100% to 101%.
  - 2 of 4 circuits are predicted to be loaded between 95% and 100%.
  - The remaining circuit is predicted to be loaded 88% to 89%.

- **Contingency Configuration – Thermal Loading:**
  - All four circuits have contingency loading risk greater than 16 megawatt hours.

- **Voltage Performance:**
  - Low voltage is predicted on 3 of 4 circuits.

- Reliability Performance:
  - 2 of 4 circuits with high 5-year average frequency and duration statistics

Q. Based on the needs summarized above, did the Company take a comprehensive approach when planning for a solution?

A. Yes, and that comprehensive solution was developed through a process that included collaboration with the Division. Of all the presentations and filings made regarding the recommended Tiverton solution as of the date the Petition was filed, the Company had not received any negative comments regarding the thoroughness of the analysis or the reasonableness of the solution.

Q. In regard to the 33F6 circuit, why is the Company seeking reimbursement for 21,000 and not 9,300 feet? Please explain.

A. The Tiverton Area Study has always identified that the 33F6 feeder would include electrical facilities that are 21,000 feet to the point of Green's interconnection. The feeder then continues beyond Green's point of interconnection and that work has been approved through the FY 2024 and 2025 ISR Plans. Of the total cable, the Tiverton Area Study identified that 9,300 feet would be underground and the remaining cable would be overhead. Due to Green's interconnection, all 21,000 feet leading to the point of Green's interconnection will be underground. Green is paying for the difference in cost between underground and overhead. Further details are included in the Company's response to Division 3-14.

Q. Would balancing the load on the three-phase feeders solve all voltage or loading violations in the area? If no, please explain.

A. No, balancing the load on the three-phase feeders would not solve all voltage or loading violations in the area, nor would it address the contingency and reliability issues. The Tiverton / Little Compton area is an electric peninsula within the RI Energy territory. The four circuits in this area are highly utilized. RI Energy and its predecessor, National Grid, have been installing minor equipment to balance the load in this area for over 10 years. There are no further opportunities for simple balancing solutions.

Q. How would the 33F6 circuit improve reliability?

A. The circuits in the Tiverton area are heavily loaded. For main line outages, it is difficult to use neighboring circuits to restore customers. The 33F6 provides the needed capacity and new switch points to address the reliability issues.

Q. Please explain what are the potential consequences of the N-1 exposure in the Tiverton area?

A. The contingency load at risk analysis identifies portions of the electric system that can result in extended interruptions for a large number of customers. The potential consequences are limited ability to restore customers which results in the high reliability statistics experienced by the circuits in this area.

Q. If not for the Tiverton Project, how would the Company address that exposure?

A. If the Tiverton Project were not interconnected, the Company would address the load at risk exposure by installing a new circuit routed in the same manner as the circuit for the Tiverton Project.

Q. By approving this Petition, will the Division and PUC be locked into all Area Study solutions?

A. No. Area Study solutions may evolve over time as more information becomes available. While the Company recognizes that investments will be examined through the ISR proceedings and petitions such as this one, it is important to acknowledge that the area study and long-range plan process has been vetted and is a good process for identifying ISR projects and the potential of overlap between system needs and DG interconnection efforts. In this case, the Company believes the needs and solution identified through the Tiverton Area Study remain valid.[5] Furthermore, the continuation of the Tiverton feeder beyond Green's point of interconnection has already been vetted and approved through the FY 2024 and 2025 ISR Plans.

[5] In this case, the Company believes the needs and solution identified through the Tiverton Area Study remain valid today. However, even if circumstances changed since the Tiverton Area Study, the Company stated, at the time the Interconnection Tariff was amended to include the acceleration provisions, "that in order to provide certainty to developers, the Company would honor any accelerated modification set forth in an interconnection service agreement even if the ultimate 'need' proves to be later than previously forecasted in the five-year capital plan." See PUC Report and Order No. 23379 in Docket No. 4763 at Page 7.

V. ISR Materials

Q. When did the Tiverton work first show up in an ISR, including 5-year plan within the ISR?

A. The Company refers to the need for the extension of the 33F6 circuit in its FY 2023 ISR Proposal, Docket No. 5209 on Bates Page 37. The Company did not have any spending proposed in the FY 2023 Plan for this work nor a completion date. Spending was first proposed in the FY 2024 ISR Plan Docket No. 22-53 EL. As mentioned above, the approved FY 2024 and 2025 ISR Plans include the continuation of the Tiverton feeder beyond Green's point of interconnection.

Q. In this case, is the Tiverton Work "premature" as labeled by Mr. Booth?

A. No. The need for the Tiverton Work was identified through the Tiverton Area Study and approved ISR spend in the area began in FY 2024. The Company always takes affordability and executability into consideration when compiling its annual ISR Plans for needed investments. In this case, the Tiverton Work was planned to be completed in FY 2029 which was due to affordability and executability considerations, not because the investment was not needed sooner. Green's DG Project accelerated the execution of the investment.

VI. Conclusion

Q. Is PUC approval of the Petition consistent with the Interconnection Statute?

A. Yes.

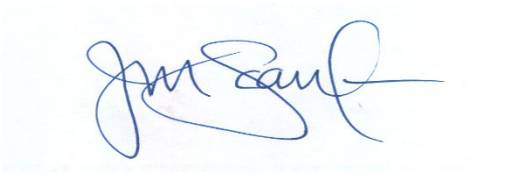
Q. Does this conclude this testimony?

A. Yes, it does.

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

May 7, 2024
Date

Docket No. 23-37-EL Rhode Island Energy – Petition for Acceleration Due to DG Project – Tiverton Projects
Service List updated 2/7/2024

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