

Paragraph 5 Notification of Potential Need for an ASO Study

December 23, 2019

Distributed Generation Interconnection

National Grid Reporting Requirements – Affected System Operator Studies

The Narragansett Electric Company (NECo) has become aware that there is the potential need for an Affected System Operator study that will implicate three or more DG applications or more than 15 MWs of DG capacity and is hereby notifying the Rhode Island Public Utilities Commissions (RI PUC) in accordance with Paragraph 5 of the Distributed Generation (DG) Interconnection National Grid Reporting Requirements - Affected System Operator (ASO) Studies. Specifically, NECo has become aware that there is now a potential need for a second DG Area ASO Level 3 Comprehensive Transmission System Impact Study in Rhode Island that, at this point in time, will include 15 DG Interconnection Service Applications.

- a) **An explanation of why NECo believes there is a potential need for an ASO study:** ISO-NE, in collaboration with New England Power (NEP), have determined that 15 applications, totaling approximately 89.0 MW in NECo's service territory in Western Rhode Island will require further analysis. The list of affected applications is shown in section (f) below. NECo's transmission provider in the area, New England Power Company (NEP), has worked with ISO-NE to determine that a Level 3, Comprehensive Transmission System Impact Study will be required for these applications which are looking to interconnect at a multiple transmission injection points. None of these applications have received an Interconnection Service Agreement (ISA).
- b) **Whether and what additional information is needed to determine if an ASO study is necessary:** No additional information is needed at this time.
- c) **Expected date when NECo will know whether an ASO study is necessary:** National Grid, working with NEP and ISO-NE has found it necessary that a DG Area ASO Level 3 Comprehensive Transmission System Impact Study is required for these projects.
- d) **Areas/substations potentially impacted:** The areas and the substations are in **Western** Rhode Island region of NECo's service territory:

Power Supply	Substation	# of Apps	AC Rating (kW)
Western NECo	Chase Hill	2	9450
Western NECo	Drumrock	1	4975
Western NECo	Farnum Pike	1	8000
Western NECo	Hopkins Hill	1	3750
Western NECo	Kent County	3	17625
Western NECo	Kenyon	4	19600
Western NECo	Westerly	1	5625
Western NECo	Wood River	2	20000

- e) **Number of DG applications potentially affected and total associated MWs:** There are 15 applications that are potentially affected that include an approximate total of 89.0MW.
- f) **A spreadsheet with details of each affected DG application, including but not limited to: application number, current application status, substation and town/city at which DG application is seeking to interconnect, alternating current nameplate capacity, and estimated date on which the project would be authorized to interconnect without the ASO study:** Please see below screenshot of the required information above:

Case Number	Case Status	Substation	Town	AC Rating (kW)	Estimated Interconnection Date without ASO Study
201289	Study - ASO Hold	Chase Hill	Hopkinton	4500	Q1 2021
193060	Study - ASO Hold	Chase Hill	Hopkinton	4950	Q1 2021
185255	Study - ASO Hold	Drumrock	Warwick	4975	Q1 2021
201828	Study - ASO Hold	Farnum Pike	Smithfield	8000	Q1 2021
207095	Study - ASO Hold	Hopkins Hill	Coventry	3750	Q1 2021
197003	Study - ASO Hold	Kent County	West Greenwich	10000	Q1 2021
201286	Study - ASO Hold	Kent County	West Warwick	3625	Q1 2021
212672	Study - ASO Hold	Kent County	West Greenwich	4000	Q1 2021
232295	Study - ASO Hold	Kenyon	Richmond	4900	Q1 2021
232306	Study - ASO Hold	Kenyon	Richmond	4900	Q1 2021
232301	Study - ASO Hold	Kenyon	Richmond	4900	Q1 2021
232308	Study - ASO Hold	Kenyon	Richmond	4900	Q1 2021
212346	Study - ASO Hold	Westerly	Westerly	5625	Q1 2021
188972	Study - ASO Hold	Wood River	Hopkinton	10000	Q1 2021
188973	Study - ASO Hold	Wood River	Hopkinton	10000	Q1 2021

- g) **Details of the NECo's communications with ISO New England Inc. and any other Affected System Operators:** Based on the submitted list of projects, NEP worked with ISO-NE on how the projects can progress. Given the location and aggregated MW of these projects, it has been determined the DG Area ASO Level 3 Comprehensive Transmission System Impact Study for these projects cannot start until the ongoing RI DG Area ASO Study is completed. The power flow, short circuit and stability analyses associated with the ongoing RI DG Area

ASO Study is, at this point in time, expected to be completed by March 31, 2020. The expected completion date for the PSCAD analysis is, at this point in time, yet to be determined.

- h) **How the situation has impacted interconnection timelines to date:** The 15 Pre-ISA applications and their associated Distribution System Impact Studies, will be placed on an ASO Hold pending ISO-NE approval of the RI DG Area ASO Level 3 Transmission System Impact Study associated with their applications.

- i) **If found to be necessary, how the ASO study would impact interconnection timelines:** An Area ASO Level 3 Comprehensive Transmission System Impact Study has been found to be necessary. The Area ASO Level 3 Comprehensive Transmission System Impact Study is estimated, at this point in time, to take 6-9 months and won't commence until after the completion of the ongoing RI DG Area ASO Level 3 Comprehensive Transmission System Impact Study.

- j) **Any proposed resolutions NECo is exploring to enable some affected DG applications to proceed with the interconnection process prior to completion of the ASO study:** No additional resolutions are being explored at this time.

- k) **NECo's plan to address the situation and minimize delays to interconnection timelines of affected DG applications:** NECo, along with NEP and ISO-NE, will work to complete the required Level 3 Comprehensive Transmission System Impact Study as efficiently as possible once the ongoing RI DG Area Transmission Study is completed.

- l) **A draft written notification to potentially affected DG applicants for Department review. The written notification should include: items a-e above, and potential impacts on interconnection timelines and costs:** See attached proposed "Paragraph 5.I The attached communications are ready to be delivered to all affected applicants subject to the review and approval of the RI PUC.