

Section 5 Notification of Potential Need for an ASO Study

December 13, 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 (ASO) study that will implicate three or more DG applications or more than 15 MWs of DG capacity and is hereby notifying the Public Utilities Commissions (PUC) in accordance with Section 5 of the Affected System Operator Reporting Requirements. Specifically, NECo has become aware that there is a potential need for ASO study(s) in Western Rhode Island.

- a) **An explanation of why National Grid believes there is a potential need for an ASO study:** ISO-NE has determined that 3 projects, totaling approximately 17.62 MW, in NECo's service territory in Western Rhode Island will require further analysis. The list of affected projects 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 each of these projects which are looking to interconnect at a single transmission injection point. None of these projects 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:** NECo, working with NEP and ISO-NE has found it necessary that a Level 3 Comprehensive Transmission System Impact Study will be required for these projects.
- d) **Areas/substations potentially impacted:** The areas and the substations that are impacted in Western Rhode Island region of NECo's service territory are:

Power Supply	Substation	# of Apps	AC Rating (kW)
Western NECo	Kent County	3	17625

- e) **Number of DG applications potentially affected and total associated MWs:** There are 3 DG Interconnection Service Applications that are affected for a total of approximately 17.62 MW.
- 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
197003	Study - ASO Hold	Kent County	West Greenwich	10000	Q4 2021
201286	Study - ASO Hold	Kent County	West Warwick	3625	Q4 2021
212672	Study - ASO Hold	Kent County	West Greenwich	4000	Q4 2021

- g) **Details of 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 ASO Level 3 Comprehensive Transmission System Impact Study for these projects cannot start until the ongoing RI DG Area Study is completed.
- h) **How the situation has impacted interconnection timelines to date:** The 4 Pre-ISA applications and their associated Distribution System Impact Studies, will be put on ASO Hold pending ISO-NE approval of the ASO study.
- i) **If found to be necessary, how the ASO study would impact interconnection timelines:** An ASO Level 3 Comprehensive Transmission System Impact Study has been found to be necessary. These Level 3 Comprehensive Transmission System Impact Study is estimated to take 6-9 months and won’t commence until after the completion of the ongoing RI DG Area Transmission Study which is expected to complete by Q1 2020.
- j) **Any proposed resolutions the 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 are working to complete the required level 3 Comprehensive Transmission System Impact Study as efficiently as possible once the present 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 “Section 5.I Kent County - Customer Communications for an ASO Study” for the 4 Pre-ISA projects. The attached communications are ready to be delivered to all affected projects, and posted on NECo’s website, subject to the review and approval of the PUC.