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ACADIA CENTER COMMENTS

Acadia Center submits the following comments in response to the Rhode Island Division of Public Utilities and Carriers and Office of Energy Resources' request for stakeholder comments on the Initial Proposals for Distribution System Planning Improvements issued on August 15, 2017. Acadia Center is a non-profit, research and advocacy organization committed to advancing the clean energy future, and is at the forefront of efforts to build clean, low carbon, and consumer-friendly economies. Our approach is characterized by reliable information, comprehensive advocacy, and problem solving through innovation and collaboration.

Acadia Center participated in the Power Sector Transformation Initiative's earlier phases, as well as Docket 4600 and SIRI, and was one of nine stakeholders submitting comments in response to the June 2, 2017, Notice of Inquiry regarding Distribution System Planning.

Acadia Center sees the Power Sector Transformation Initiative's overarching aim of developing a more dynamic regulatory framework to enable Rhode Island and its utilities to advance a cleaner, more affordable, and reliable energy system for the 21st century and beyond as a transformative step forward for state-level energy policy. The state's energy future is dependent upon an ambitious, effective, and comprehensive response to the historic challenges and opportunities.

Acadia Center agrees that the DSP process must adapt to the changing marketplace, and can become a valuable tool for guiding not only utility investment, but also customer and marketplace activity and their added value to the grid and distribution system. We commend the agencies for recognizing the significance of additional DER not only impacting the system in new and potentially significant ways, but also their ability to become part of the solution set to address grid needs.

Initial Proposals on Distribution System Planning

In the August 15 notice, your agencies laid out five proposals designed to improve the distribution system planning (DSP) process in the state. These proposals include:

- Establish specifications for and a process to update a **Rhode Island System Data Portal**, which will enable public access to key datasets
- Develop a **Data Access and Governance Policy**, establishing guidelines for data access, sharing procedures, data requests, dispute settlement, and privacy/security protections
- Create an **Implementation Road Map for Heat Maps and Hosting Capacity Maps**, which will provide the utility and third parties with insight into locational impact and benefit of DER on the system

- Establish a process to integrate **inclusion and review of DSP Forecasts** into applicable existing dockets
- Further **align and integrate planning processes** for the distribution system, capital projects, and non-wires alternatives (NWA) to comprehensively consider DER opportunities

The breadth of these proposals is comprehensive, and they will hopefully provide a good foundation to build on the changes necessary to utilize the DSP process most effectively. These initial steps keep in mind the ultimate goal of the process – to gather, transmit, and effectively use information to drive incorporation of DER into the grid and planning processes to achieve a modernized, flexible, resilient, and low-carbon energy grid. But they are truly initial steps. Given the common recognition that conditions are changing and technologies and data-gathering capabilities will improve into the future, Acadia Center believes it is appropriate to plan for inflection points where decisions can be revisited and adjusted, and stakeholder input continually incorporated.

As an example, the notice provides that the initial implementation of the System Data Portal would take place through the upcoming National Grid rate case, but does not contemplate a venue to allow ongoing oversight or stakeholder input as the Portal progresses through the modular iterations that are contemplated. Acadia Center urges the agencies to create a specific procedure for the continuation of the process so that the data available to support the power sector transformation will continue to grow, rather than stagnate. It might be reasonable to use the annual System Reliability Procurement Plan proceedings as a venue for this continued action.

Acadia Center submits the following overarching comments regarding what comes next:

- The notice contemplates that the utility will submit multiple plans, implementation roadmaps, and proposals in its upcoming rate case. In such submissions, the utility should provide detailed plans that recognize that circumstances are changing and access to data will improve in the future, and provide for inflection points at which to incorporate information and adjust assumptions and outcomes to reduce uncertainty over time. These plans should include key market signals and metrics to inform when changing conditions make such adjustments necessary, and descriptions of how the utility will reassess such processes as forecasting and strategic DER deployment.
- All plans should have a high degree of stakeholder engagement built-in, including ongoing opportunities for fair and meaningful engagement, particularly regarding how to prioritize iterative additions of content and features which stakeholders will be using.
- The primary goal of data access is transparency, clarity, and usefulness of the information. Important aspects of securing these are levels of granularity, frequency of updates, and the quality of the presentation. Use of maps, overlays, and analysis should be common.
- Raw data is often insufficient to provide a useful picture to developers or consumers, and it is appropriate to require utilities to provide some value-added data that has been interpreted and explained as a standard offering, automatically available through the Portal. Decisions regarding what constitutes additional value-added data for which the utility may require a reasonable fee for compensation should be made through an appropriate proceeding with stakeholder input.
- Customer and system data availability should increase over time as monitoring and control technologies advance and DER adoption accelerates. The utility should provide information on current data gathering capabilities as well as concrete plans and timelines for developing capabilities to provide valuable data

we expect in the future (such as hosting capacity, DER forecasting, and DER impacts to the grid) as well as automating collection of data and acceleration of frequency of updates to data sets.

- Regular and increasingly automated updates will provide the most value for consumers and developers, who need consistently refreshed data that meets minimum accuracy requirements. As the utility gains appropriate capabilities, customers would benefit from receiving data on energy usage as close to real time as possible, through automated systems.
- Hosting capacity data needs to be location specific, provided at the most granular level possible, and regularly and frequently updated. Information on grid needs and planned investments should be integrated with hosting capacity maps. Data on time differentiated locational value and T&D deferral value should be added as soon as feasible.
- With integration of locational value and T&D deferral value, DER providers can engage through the market, without requiring a “wires alternative” to be developed prior to a NWA being proposed. Moving the utility and the market toward the presumption that DER should be one of the first tools considered to address an area of concern will more fully integrate these resources into DSP.

The experience in New York with utilities’ Distributed System Implementation Plans may provide further useful guidance on next steps. Acadia Center recently summarized the state’s DSIP experience in the June 21, 2017, analysis, “Distributed System Implementation Plans in New York.”¹

Conclusion

Acadia Center appreciates the opportunity to provide comment on the Initial Proposals for DSP Improvement and looks forward to further collaboration on these issues.

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¹ Available at: http://acadiacenter.org/wp-content/uploads/2017/06/DSIP-Summary-and-Analysis_20170621_FINAL.pdf.