



September 1, 2017

via electronic submission: DPUC.powertransformation@dpuc.ri.gov

Macky McCleary
Administrator
Division of Public Utilities and Carriers
89 Jefferson Boulevard
Warwick, RI 02888

Carol J. Grant
Commissioner
Office of Energy Resources
One Capitol Hill
Providence, RI 02908

RE: NEEP Comments Regarding Initial Proposals for Distribution System Planning Improvements and Request for Stakeholder Comment

Dear Administrator McCleary and Commissioner Grant,

On behalf of Northeast Energy Efficiency Partnerships (NEEP), I am pleased to submit comments in regards to the initial proposals for distribution system planning (DSP) improvements and request for stakeholder comments. NEEP is a non-profit whose mission is to serve the Northeast and Mid-Atlantic to accelerate energy efficiency as an essential part of demand-side solutions that enable a sustainable regional energy system. Our vision is that the region will fully embrace next generation energy efficiency as a strategy to meet energy needs in a carbon-constrained world.

NEEP thanks the Rhode Island Public Utility Commission (PUC), the Division of Public Utilities and Carriers (DPUC), and the Office of Energy Resources (OER) for the opportunity to provide input on the Power Sector Transformation Initiative. Rhode Island has been a leader in energy efficiency programs and policies for several years, scoring a four on ACEEE's state energy efficiency scorecard in 2016. The state has shown continued involvement in regional market transformation for years and the Power Sector Transformation Initiative is the next wave in regional leadership.

NEEP is pleased to assist the PUC, DPUC, OER, and other Rhode Island state agencies and stakeholders in realizing the full value DSP has to help meet the State's efficiency, clean energy and carbon emission reductions goals. NEEP commends Rhode Island in the initiative the state has taken by presenting a thoughtful and comprehensive proposal to improve the DSP process. The following comments are based on the questions posed in the August 15 Notice and NEEP's expertise in distribution system planning.

Rhode Island System Data Portal

Careful consideration should be given to the purpose of the portal and the use cases the portal is intended to support as it is developed. A well-designed portal with automation can provide a valuable vehicle for public access to data, making it available to customers and third party users. Providing access to data will encourage customers to take control of their energy use and may also help them identify new ways to conserve energy by learning from other similar profiles to their own. Customer data needs permissions to be shared publically and Rhode Island may benefit from working through any privacy issues before the portal is developed. In the portal, state-level data and heat and hosting capacity maps should be made available. There are many types of system,



customer, and grid mod data that may be worthwhile to consider adding to the portal. For example, peak load and aggregated load/demand are useful system attributes. Customer data can be customized to each individual user (associating it with their utility account number), providing a venue for customers to see their own usage. As Rhode Island goes through the Power Sector Transformation Initiative, information such as clean energy development, conservation voltage reduction, DER forecasting, and heat and hosting capacity maps may be beneficial datasets for the portal. The portal may also benefit from including potential NWA opportunities under evaluation and then whether or not they were selected. The types of data that are included in the portal should align with the goals and policies associated with its development. Using the new cost-effectiveness framework developed under docket 4600 will be helpful in ensuring the proper development of the portal.

Data Access and Governance Policy

Enabling access to building energy data is a critically important aspect of managing building energy usage. While discussions of energy data access often raise valid privacy concerns in the multi-tenant market segment, providing building owners with aggregated and anonymized whole building energy usage data is becoming the accepted solution for these concerns.¹ In order to alleviate concerns in such a scenario, most utilities offering aggregated and anonymized data require tenant consent if a building has: (1) a small number of tenants; and/or (2) no single tenant uses a significant proportion of the building's energy.

The initial proposal cites the 15/15 aggregation threshold proposed by the Joint Utilities in New York. This proposal was rejected by the commission after stakeholder comment pointed to less conservative standards adopted by various jurisdictions. Applying the 15/15 standard to the use of building energy management data may limit the number of buildings that report building energy consumption without customer authorization.

In June 2017, the Joint Utilities of New York proposed a 4/50 standard in place of the 15/15 standard. This requires the building to have four tenants, without a single unit accounting for 50 percent of the whole building energy consumption.² Given size and characteristics of the Rhode Island grid, agencies may find it valuable to consider flexible standards, either by the number of accounts or percentage of aggregated load, to be appropriate for Rhode Island.

The Department of Energy's [Guide to Data Access and Utility Customer Confidentiality](#) (the guide) may help illuminate the value of various approaches to energy data aggregation thresholds, as well as many other industry best practices in the sphere of energy data access. The table below from the guide provides energy data aggregation thresholds by jurisdiction.

¹ Northeast Energy Efficiency Partnerships. Public Building Energy Benchmarking: Utility Data Access Options and Opportunities. Page 22. (December 2016) Available at:

<http://www.neep.org/sites/default/files/resources/Public%20Sector%20Building%20Energy%20Benchmarking%20-%20Utility%20Data%20Access%20Options%20and%20Opportunities.pdf>

² Joint Utilities. Docket No. 16-m-0411. Joint Utilities' Benchmarking of Aggregated Customer Data Privacy and Proposed Privacy Standard for Building Energy Management. Available at: <http://documents.dps.ny.gov/public/Common/ViewDoc.aspx?DocRefId=%7bD298636C-C085-4538-A39C-C498247652CD%7d>

**Table 1 Energy Data Aggregation Thresholds by Jurisdiction**

Utility Company (Service Territory)	Aggregation Thresholds
Austin Energy (Texas)	4/80%
Baltimore Gas & Electric	5
Clark Public Utilities (Washington)	2
Commonwealth Edison (Illinois)	4
Consolidated Edison (New York City)	2
Eversource (Boston & Cambridge, MA)	4/50%
National Grid (Boston, MA)	4/50%
National Grid (New York City)	4/50%
Pacific Power (Oregon)	5
Peoples Gas (Illinois)	5
Pepco (District of Columbia)	5
PSEG Long Island (New York City)	2
Puget Sound Energy (Washington)	5
Rocky Mountain Power (Utah)	5
Seattle City Light (Washington)	2
Xcel Energy (Minnesota, Colorado)	4/50%

U.S. DOE 2016

Hosting Capacity and Heat Maps

Hosting capacity and heat maps provide various benefits to the DSP process. Heat map shows areas where there is a need for relieve load from overloaded meters, which drives DERs towards locations with a problem where additional resources may help alleviate load concerns. This tool may be used to identify areas of concern and opportunities for NWA solutions. These maps may be updated according to peak seasons and the planning process. Increasing the frequency of updates may provide significant value to DER providers, as well as accuracy of updated data for the planning process. Certain areas of the state, particularly areas high in summer tourism, may present cases for NWA, and an updated heat map during the summer and winter seasons may help identify and support these needs.

Forecasts

The publication of forecast assumptions and methodology encourages a level of transparency which is worth encouraging. It may also be beneficial to provide access to this information on the RI System Data Portal and the SRP docket for stakeholders to review. Regulators may benefit from considering the addition of electrification forecasts in the near future. With the beneficial electrification work stream, electrification of the transportation and heating systems in Rhode Island will increase, and it may be in the state's best interest to consider this impact on forecasting before it substantially increases.



Alignment of DSP, Capital Project, and Non-Wires Alternatives (NWA) Planning

As utility regulators in Rhode Island contemplate major infrastructure investments to keep pace with pockets of growing demand, full- and partial- non-wires alternatives (NWAs) solutions — based on deployment of distributed energy resources — are a cost-effective option within the DSP process.

Rhode Island may benefit from considering the screening criteria for NWA as a part of a larger NWA evaluation process to ensure NWA opportunities will successfully reduce, avoid, or defer a wires solution in the state. For instance, forecasting to determine if capacity is adequate, as well as heat maps to identify opportunities for full- and partial- NWA solutions may be integral parts to evaluation NWA opportunities. Rhode Island may benefit from examining the evaluation process in New Hampshire, which includes reviewing the demand forecast and T&D deficiencies, followed by screening projects.³ In January 2017, NEEP completed a [brief on NWA policies and programs in the region](#), this resource may be helpful in the alignment of DSP, Capital Project, and Non-Wires Alternatives (NWA) Planning.⁴

While partial NWA investment reduces the scope of unavoidable capital investment, Rhode Island may benefit from ensuring there is still a focus on full NWA opportunities, particularly after the success of the Tiverton/Little Compton pilot. To do so, Rhode Island may consider criteria checklist for partial versus full NWA opportunities in the evaluation process since not all will be evaluated on the same platform.

Conclusion

NEEP commends the PUC, DPUC, and OER for their continued leadership. The Power Sector Transformation Initiative seeks to shape the ongoing transformation of the electric grid and NEEP hopes to continue to provide resources that can assist Rhode Island in doing so. We would be pleased to provide further information to assist in the distribution system planning work stream.

Sincerely,

A handwritten signature in black ink that reads 'Samantha Caputo'.

Samantha Caputo
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Northeast Energy Efficiency Partnerships

³ Liberty Utilities, State of New Hampshire before the Public Utilities. Docket No. DE-16-097. Pg 39-40, 60-64, (January 2016) Available at: https://www.puc.nh.gov/Regulatory/Docketbk/2016/16-097/INITIAL%20FILING%20-%20PETITION/16-097_2016-01-15_GSEC_DBA_LIBERTY_LCIRP.PDF

⁴ NEEP, EM&V Forum and Policy Brief: State Leadership Driving Non-Wires Alternative Projects and Policies, (January 2017), Available at: <http://www.neep.org/sites/default/files/resources/NWA%20brief%20final%20draft%20-%20CT%20FORMAT.pdf>