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RI EERMC
c/o Becca Trietch
RI Office of Energy Resources
One Capitol Hill
Providence, RI 02903

September 15, 2020

Hi Becca:

I write to comment on the proposed system reliability plan. At a time when our State has such clear priorities for climate change, reduced energy costs, energy security, electrification of our thermal and transportation sectors, equity and the conversion to 100% renewable energy by 2030, I am very frustrated that the proposed system reliability plan is so weak on proactive planning to implement non-wires alternatives that can and should reduce the cost of our transmission and distribution system while also cleaning up our energy system.

This firm has long advocated for implementation of the locational incentive that was long ago proposed to be considered and implemented as part of Rhode Island's renewable energy growth program. See R.I. Gen. Laws § § 39-26.6-22. That advocacy has repeatedly been met with Narragansett Electric's response that it cannot find net benefits from siting renewable energy projects in specific locations where our electrical system has insufficient capacity. Indeed, even while RI OER has commissioned a consultant to study policy adders in the REG program, the one adder that is specifically contemplated in the statute, the locational incentive, has not even been proposed for consideration.

Yet, despite this evident disregard for non-wires alternatives, the utility continues to reap huge financial gains from making investments in improving our electrical system. Indeed, the utility assesses more and more of the cost of those improvements to the same local distributed generation projects that reduce our reliance on the electrical transmission and distribution systems. Under these conditions, it is very hard to understand how the EERMC or PUC could continue to allow National Grid to originate a plan for system reliability. It's even harder to see how either agency can possibly approve a system reliability plan that is so weak on analyzing the opportunities afforded and laying out the plan to achieve non wires alternatives.

As just one example, the system data portal section of the proposed system reliability plan completely and utterly underperforms the Company's PST Plan in Docket 4780. That PST plan provided the following information:

> 3.1 System Data Portal DER providers desire access to transparent system data to facilitate the integration of DER into distribution system planning and operations. To facilitate the sharing of information with DER providers, and others, the Company is proposing to develop a system data portal and populate it with information intended to facilitate DER integration in the most advantageous locations and as cost-effectively as possible. The system data portal will be a web-

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based application that provides relevant distribution planning information and distribution system data that have been identified to be of interest by DER providers and other interested parties during power sector transformation stakeholder engagement and similar work in National Grid's New York jurisdiction.1 The portal will provide access in one common location for documents such as regulatory filings, load and DER forecasts, and distribution planning criteria. In addition, system data, such as circuit loading, hosting capacity analysis, and heat maps of beneficial DER locations, will be provided via interactive geographic maps. The functionality and the look and feel of the portal will be similar to a system data portal recently deployed in National Grid's New York jurisdiction. Although utilization details continue to evolve in New York, best practices and lessons learned will be used to refine efforts in Rhode Island to the furthest extent possible.

DER developers are the target audience for the system data portal. Through a series of stakeholder discussions in Rhode Island DER developers have expressed an interest in using system data to improve planning efforts associated with efficiently deploying their products and services. Moreover they have noted transparency concerning distribution system planning processes, system needs, DER opportunities, and pertinent data to inform potential interconnection requirements as key.

The need for a system data portal has been the topic of considerable stakeholder engagement within the distribution system planning working groups of the power sector transformation initiative. There is general consensus among Rhode Island stakeholders that such a portal would provide benefits and advance the objectives of integrating additional clean energy generation in a cost-effective and timely manner. DER providers have stated that information such as hosting capacity analysis facilitates the siting of new resources by identifying areas where DERs can be integrated without the need for costly system upgrades and extended interconnection timelines. Similarly, identifying areas of the grid that may become constrained in the future will help DER providers develop potential non-wires alternatives or deploy DERs that can defer distribution system upgrades if appropriately designed. This information could also be used to direct strategic electrification facilities, such as electric vehicle charging stations, to lightly loaded areas. The Company considers the system data portal to be a foundational investment for advancing Rhode Island's clean energy policies.

[1] For example, as part of their written comments to the PST Distribution System Planning work stream, the Northeast Clean Energy Council (NECEC) and Advanced Energy Economy Institute (AEE Institute) stated "A well designed data portal, developed iteratively with increasing automation, can provide a valuable conduit for information – making it available to solution providers and customers, and enabling the utility to incorporate third party solutions and customer choices into distribution system planning." and "The portal could ultimately help to accelerate collaboration between utilities and solutions providers to address areas of greatest interest and economic value." (NECEC and AEEI Letter; Re: Initial Proposals for Distribution System Planning Improvements and Request for Stakeholder Comment; September 1, 2017)

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The content of the system data portal is expected to grow and evolve over time as new tools, data, and analysis are developed. Initially, public and other readily available data and reports will be hosted in a common location for easy web access. In concert with the creation of the portal, the Company is proposing to begin developing detailed assessments of hosting capacity and capacity constraints. The results of these assessments will be posted on the portal in the form of interactive heat maps. While striving for transparency, all data and information that are to be posted on the system data portal will be presented in a fashion that does not present physical security or cybersecurity concerns and that protects the privacy of customer information. Stakeholder engagement is essential to ensure that the system data portal is effective and the Company will continue to work with stakeholders to consider future enhancements.

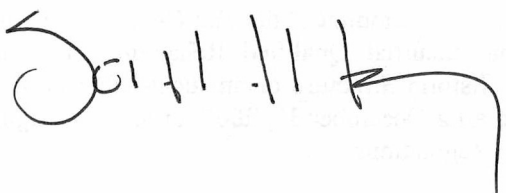
Project Cost Estimates Experience with developing the New York System Data Portal indicates that the labor to develop and maintain the information posted on the portal is the major cost component. The most demanding tasks involve creating hosting capacity analysis and capacity constraint heat maps. Estimates of the resources required to perform these assessments are based on similar work in progress at National Grid's New York affiliate. As this is incremental work beyond traditional distribution system planning, the Company plans to hire additional engineers and analysts to manage the portal. The anticipated additional resources include two distribution planning engineers and one analyst and represent $690,000 of the estimated increment in annual O&M costs. Software and data hosting costs for the initial functionalities of the portal are approximately $10,000 annually. To begin work on the portal as soon as possible, $80,000 has been proposed in the SRP 2018 Report. The system data portal proposal within the SRP 2018 Report reflects an initial one-year effort and only limited mapping functionality.

Why is so little of the Company's PST plan for the system data portal incorporated into its plan for executing on the SRP?

Approximately 65% of our energy bill comes from the cost of National Grid's management of our transmission and distribution system through its affiliates New England Power Company and Narragansett Electric Co. respectively. Non-wires alternatives reduce the demands on and the costs of our transmission and distribution systems. Please be sure that all costs and benefits of non-wires alternatives have been carefully considered by a well-qualified entity that does not have a conflicting economic interest in transmission and distribution system investments. RI's mandate for system reliability and its Energy Plan policy goals on energy security, energy cost, equity and climate demands such an independent and accurate assessment.

Thank you for your consideration of these comments.

Sincerely,



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