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2024-2026 System Reliability Procurement Three-Year Plan

Prepared for the SRP Technical Working Group August 16, 2023

Front Matter

2024-2026
System Reliability Procurement (SRP)
Three-Year Plan

DRAFT FOR EXTERNAL REVIEW

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Drafted by:
The Narragansett Electric Company d/b/a Rhode Island Energy

Executive Summary

Executive Summary

System Reliability Procurement (SRP) encompasses the activities conducted by The Narragansett Electric Company d/b/a Rhode Island Energy to meet or mitigate a gas or electric system need or optimization that provides the need or optimization by employing diverse energy resources, distributed generation, or demand response.[1] In this *2024-2026 SRP Three-Year Plan* ("Plan"), Rhode Island Energy summarizes its proposed implementation plan for system reliability procurement. This Executive Summary is intended to provide a high-level overview.

How does Rhode Island Energy identify opportunities for system reliability procurement?

How can third-party solution providers find opportunities to propose solutions?

How can stakeholders engage?

Note for reviewers:

Specific feedback is requested on the topics that would be most useful to highlight in the Executive Summary, assuming the target audiences for the executive summary are stakeholders and third-party solution providers.

Given feedback on topics, we will draft executive summary content for those topics, to be included in the subsequent draft of the 2024-2026 SRP Three-Year Plan.

[1] Per the Rhode Island Public Utilities Commission's Least-Cost Procurement Standards, 2023 version.

Section 1. Introduction

Introduction

System Reliability Procurement (SRP) encompasses the activities conducted by The Narragansett Electric Company d/b/a Rhode Island Energy to meet or mitigate a gas or electric system need or optimization that provides the need or optimization by employing diverse energy resources, distributed generation, or demand response.[2] In this *2024-2026 SRP Three-Year Plan ("Plan")*, Rhode Island Energy summarizes its proposed implementation plan for system reliability procurement.

The Rhode Island Public Utilities Commission provides principles for the design of each Three-Year Plan in their Least-Cost Procurement Standards, shown in Figure 1.

In designing this Plan, Rhode Island Energy translated the principles in Figure 1 to a set of four objectives and strategized how to build these objectives into the Plan. Figure 2, next page, connects principles A through C from Figure 1 to these objectives and actions. This figure was discussed with the SRP Technical Working Group on May 17, 2023, and the Energy Efficiency and Resource Management Council on May 18, 2023.[3]

Throughout this Plan, we include several figures and tables to aid in understanding and clarity. Figures with a blue background apply generally to the electric and gas systems. Figures with a yellow background provide definitions or other regulatory, statutory, or policy citations. Figures with a teal background are specific to the electric system. Figures with a purple background are specific to the gas system. The objective of this color coding is to assist readers in navigating this Plan.

Figure 1: General Plan Design and Principles

A. In order to meet Rhode Island's gas and electric energy system needs and policy goals in a manner consistent with R.I. Gen. Laws §39-1-27.7, Three-Year SRP Plans should include both a broad consideration of needs and goals and broad consideration of solutions to these needs and goals in order to encourage optimal investment by the distribution company.

B. The Three-Year SRP Plan should be integrated with the distribution company's distribution planning process and be designed, where possible, to complement the objectives of Rhode Island's energy policies and programs as described in Section 3.2.A.

C. The Three-Year SRP Plan should be designed so that potential non-utility solution providers can understand how and when the distribution company makes decisions to implement System Reliability Procurement in lieu of Utility Reliability Procurement.

Source: Least-Cost Procurement Standards, Section 4.3 (Docket No. 23-07-EE)

[2] Rhode Island Public Utilities Commission's Least-Cost Procurement Standards (Docket 23-07-EE).

[3] For more information about the SRP Technical Working Group, see Section 5. To date, the 2024-2026 SRP Three-Year Plan was discussed with the SRP TWG on May 17 and July 19, and with the Energy Efficiency and Resource Management Council on May 18.

Introduction

Figure 2. RIE Priorities for the 2024-2026 SRP Three-Year Plan

A	B	C	Objectives	How
		√	**Readable**: Easy to navigate and understand by any reader, including third-party solution providers	• Restructuring sections and content to be more responsive to the LCP Standards Chapter 4 • Organizational discipline • Concise writing, figures
√	√		**Useful**: Demonstrate clear alignment and integration with other business functions and investment proposals	• Links to overarching business objectives • Cross references • Calling out contingencies if/when they exist
√		√	**Actionable**: Where we identify areas of innovation or improvement, provide clear and actionable workplans	• Work/research/discussions needed • Milestones • Interim and end deliverables • Eval process for internal EE/DR/etc efforts
√	√	√	**Compelling**: Clear proposals for PUC ruling with well-supported justification and reasoning	• Screening requirements and implementation plans for non-wires and non-pipes solutions • Annual reporting requirements • Performance metrics and incentive plan • Other proposals, as appropriate

Notes: Presented to and discussed with the SRP TWG on May 17, 2023, and with the Energy Efficiency and Resource Management Council on May 18, 2023. Columns A, B, and C correspond to principles A, B, and C in Figure 1. Teal coloring indicates the objectives advance those principles.

Contents

This Plan is organized into sections aligned with required content as described in Chapter 4.4 of the Least-Cost Procurement Standards. Non-wires solutions and non-pipes solutions are each addressed throughout each of the sections of this Plan. The appendices to this Plan provide additional details to aid in understanding of the Report and to comply with legal and regulatory reporting requirements.

Section 2. System Reliability Procurement Process

Overview

In this Section, Rhode Island Energy describes the system planning process, from identification of system needs, screening for system reliability procurement, and procuring, evaluating, and implementing solutions.

We describe each step in detail. Although many steps are the same regardless of whether the system need or optimization is for the electric or gas system, there are some steps in which we handle electric system needs differently from gas system needs. We take care in pointing out these differences and explain why these differences are appropriate within our pre-filed testimony.

Figure 3 summarizes the system reliability procurement process as a sequence of high-level steps. These high-level steps are fully integrated into the overall electric and gas system planning processes. We walk through each of these steps in order in the following subsections.

Figure 3. Overview of System Reliability Procurement Process

 **Identify system needs**	Engineers use forecasts about energy demand and distributed energy resources alongside information like asset age to model the electric and gas systems. These models help engineers pinpoint system needs that should be resolved soon.
 **Screen for possible solutions**	Engineers apply screening criteria to understand which types of solutions are potentially feasible. Possible solutions include infrastructure investment, utility-run programs, and system reliability procurement.
 **Scope best alternative URP solution**	Engineers scope the best alternative utility reliability procurement (URP) solution for the system need or optimization. Possible solutions are utility owned and operated by definition.
 **Solicit proposals**	If system reliability procurement is a potential feasible solution, then engineers will work with the procurement team to develop a competitive bid process for third-party vendors to propose their solutions.
 **Evaluate proposals**	Representatives from throughout Rhode Island Energy will help evaluate proposals from third-party vendors using pre-defined evaluation criteria that assess technical and economic viability.
 **Request regulatory approval**	If a proposal is successful, then Rhode Island Energy will formally submit the solution for regulatory approval through an “SRP Investment Proposal.”
 **Implement solution**	If the SRP Investment Proposal is approved, Rhode Island Energy will work with the third-party vendor to implement the solution in time to resolve the system need.

Step 1. Identify System Needs and Optimization

The Rhode Island Energy team identifies system needs and opportunities to optimize system performance through routine distribution system planning studies, through annual distribution system planning processes, and through annual consideration of supply-related needs and opportunities.

Electric System
Engineers use electrical models to simulate conditions on the electric system, given inputs like forecasted load growth, forecasted penetration of distributed energy resources, and characteristics of electric assets, like age. These models help engineers pinpoint system issues and when they need to be addressed. Engineers do this type of planning every several years for geographical electrical areas (called area studies) and annually for targeted immediate system needs.

Engineers and supply procurement team members will also discuss potential supply constraints or needs on an annual basis. Rhode Island and the region typically experience peak supply demand on hot summer evenings, which can result in higher supply costs for customers. The team considers high supply costs as an opportunity for optimization of system performance.

Gas System
The process of identifying gas system needs and opportunities to optimize performance is very similar to that followed for electric system planning. Engineers use gas supply and distribution system models to perform a detailed analysis of facilities and system performance within identified geographic gas areas as well as for targeted immediate system needs. Gas engineers and the gas procurement team discuss potential supply constraints and needs as part of the system assessment. This process prioritizes the identification of capacity-constrained areas – i.e., locations on the gas system where the forecasted peak demand exceeds the amount of pipeline capacity we can rely on to be available on the coldest winter days.

Figure 4. Definitions

Electric System Needs
Needs to serve both customer load and customer generation, including, but not limited to, system capacity (normal and emergency), voltage performance, reliability performance, protection coordination, fault current management, reactive power compensation, asset condition assessment, distributed generation constraints, operational considerations, and customer requests.

Gas System Needs
Needs to serve customers, including, but not limited to, system capacity (normal and emergency), pressure management, asset condition assessment, gas service that supports electric distributed generation, and operational considerations.

Optimization of System Performance
Improvement of the performance and efficiency of the gas or electric system that includes enhanced reliability, peak load reduction, improved utilization of both utility and non-utility assets, optimization of operations, and reduced system losses.

Source: Least-Cost Procurement Standards (2023 version)

Step 2. Screen for Possible Solutions

Once a system need or opportunity for system optimization is identified, the Rhode Island Energy team screens for solution alternatives that may be technically and economically viable.

These solution alternatives are either considered utility reliability procurement or system reliability procurement, defined in Figure 5.

Possible solutions our team considers include, but are not limited to, any one or combination of:

- Infrastructure like transformers and wires (called “wires solutions”), or pipes (called “pipes solutions”)
- “Non-wires solutions” and “non-pipes solutions”
    - Energy savings through targeted energy efficiency and conservation
    - Energy shifting through targeted demand response
    - Targeted incentives for distributed energy resources, like energy storage and renewable energy
    - Solutions developed by third-party vendors

Figure 5. Definitions

Utility Reliability Procurement
Procurement to meet or mitigate a gas or electric distribution system need or optimization that is not System Reliability Procurement and thus represents a utility-only investment or expenditure.*

* For example, many such Utility Reliability Procurement investments and operations are proposed in annual Infrastructure, Safety, and Reliability Plans filed pursuant to R.I. Gen. Laws § 39-1-27.7.1(c)(2).

System Reliability Procurement
Procurement to meet or mitigate a gas or electric distribution system need or optimization from a party other than the gas or electric utility** that provides the need or optimization by employing diverse energy resources, distributed generation, or demand response.***

** A utility proposal to own and operate non-traditional investment or new operations and maintenance services, such as new voltage-regulation equipment, battery storage, or vegetation management, and any vendor services associated with such investment or service, shall not be considered System Reliability Procurement per this definition. Such investments and services are, however, still subject to the Guidance Document issued in Docket No. 4600A.

*** Including, but not limited to, the resources named in R.I. Gen. Laws § 39-1-27.7(a)(1)(i)-(iii).

Source: Least-Cost Procurement Standards (2023 version)

Step 2. Screen for Possible Solutions

Figure 6, below, compares and contrasts key terminology that describes various possible solutions to assist with understanding.

System reliability procurement encompasses solutions proposed by third-party vendors and solutions operated by Rhode Island Energy. However, utility reliability procurement is limited to solutions owned and operated by Rhode Island Energy.

System reliability procurement only encompasses non-wires and non-pipes solutions. Utility reliability procurement can encompass both wires/pipes solutions and non-wires/non-pipes solutions.

Figure 6. Examples of Solutions and Relevant Terminology

	Wires/Pipes Solutions	**Non-Wires/ Non-Pipes Solutions**
Utility Reliability Procurement (URP)	Reconductoring Upsize transformers Pipe replacement	Utility-owned and operated battery storage CVR/VVO
System Reliability Procurement (SRP)	Not applicable	***Utility-run*** or ***third-party*** demand response or targeted energy efficiency ***Third-party*** owned and operated battery storage

Step 2. Screen for Possible Solutions – Electric System

Engineers screen system needs for the potential viability of a system reliability procurement solution. This screening is fully integrated into the planning process and is part of the normal course of business.

Screening criteria are described in Figure 7, below. These screening criteria are applied by the engineering team to all electric system needs and opportunities for optimizing system performance that arise during Step 1.

System needs that fail any of the screening criteria will be proposed as "wires solutions" through Rhode Island Energy's annual *Electric Infrastructure, Safety, and Reliability ("ISR") Plan* at the appropriate time.

System needs that pass the screening then advance through the following steps to solicit and evaluate the viability of system reliability procurement solutions.

Figure 7. Screening Criteria for Non-Wires Solutions through System Reliability Procurement

Not an asset condition issue

Electric assets that have reached the end of their lifetimes need to be replaced; a non-wires solution (whether system reliability or utility reliability procurement) cannot resolve an asset condition issue.

Eligible system need or optimization

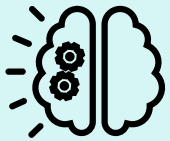
Eligible system needs and optimization include load relief, reliability, and supply cost mitigation. If the system need is load relief, the amount of load should not exceed 20% of total load in the area of the defined need.

Sufficient Market Interest

The system need or optimization must be substantial enough to plausibly result in market interest. Rhode Island Energy uses a guideline of the wires solution costing at least $1 million as a proxy for whether a system need is likely to gain sufficient market interest.

Adequate time to implement

There must be at least 24 months before the start date of non-wires solution implementation to allow adequate time to go to market, evaluate proposals, gain necessary approvals, and construct or deploy the proposed non-wires solution.



Additionally, by the Company's discretion, Rhode Island Energy may pursue a project that does not pass one or more of these screening criteria if there is reason to believe that a viable non-wires solution exists, assuming the benefits of doing so justify the costs.

Step 2. Screen for Possible Solutions – Gas System

Gas system reliability procurement is a nascent program and process, requiring ongoing development so that full integration into the gas planning process and normal course of business can be achieved. As with the electric system, the objective is for gas engineers to screen system needs for the potential viability of a system reliability procurement solution. Given the emergent nature of the program, we anticipate the screening process and criteria may evolve, informed by experience and learnings. Any proposed changes will be submitted for regulatory approval per LCP Standards at the appropriate time.

Once embedded in the gas planning process, screening criteria will be applied by the engineering team to system needs and opportunities for optimizing system performance that arise during Step 1. Screening criteria for the gas system are described in Figure 8.

System needs that fail any of the screening criteria will be proposed as "pipes solutions" through Rhode Island Energy's annual *Gas Infrastructure, Safety, and Reliability ("ISR") Plan* at the appropriate time.

System needs that pass the screening then advance through the following steps to solicit and evaluate the viability of system reliability procurement solutions. Projects that meet the screening criteria will be prioritized in consideration of capacity-constrained areas on the gas system.

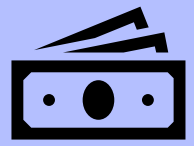
Figure 8. Screening Criteria for Non-Pipes Solutions through System Reliability Procurement

Not an asset replacement investment

Gas assets that pose immediate, local, and system-wide safety and/or reliability impacts must be replaced; a non-pipes solution (whether system reliability or utility reliability procurement) cannot resolve a critical safety or reliability issue.

Eligible system need or optimization

Eligible system needs and optimization include load reduction, load removal, and supply constraint mitigation.

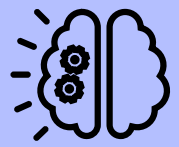


Sufficient Market Interest

The system need or optimization must be substantial enough to plausibly result in market interest. Rhode Island Energy uses a guideline of the pipes solution costing at least $0.5 million as a proxy for whether a system need is likely to gain sufficient market interest.

Adequate time to implement

There must be at least 24 months before the start date of non-pipes solution implementation to allow adequate time to go to market, evaluate proposals, gain necessary approvals, and construct or deploy the proposed non-pipes solution.



Additionally, by the Company's discretion, Rhode Island Energy may pursue a project that does not pass one or more of these screening criteria if there is reason to believe that a viable non-pipes solution exists, assuming the benefits of doing so justify the costs.

Step 3. Scope the Best Alternative URP

Least-Cost Procurement Standards require “System Reliability Procurement shall be lower than the cost of the best alternative Utility Reliability Procurement” (Section 1.3.A). Therefore, we first must understand what the best alternative utility reliability procurement solution is.

System engineers always develop their recommendation for the best utility reliability procurement solution. These solutions are described in area studies and annual *Infrastructure, Safety, and Reliability (“ISR”) Plans*.

For any system need or optimization that passes the screening criteria in Step 2 of the system reliability procurement process, the cost of the best alternative utility reliability procurement solution will be denoted as the cost against which to compare system reliability procurement proposals.

Step 4. Solicit Proposals

Rhode Island Energy will solicit proposals for all possible solutions identified, whether from a third-party vendor or an internal business functional team (i.e., utility-run non-wires/non-pipes solutions).

Solicitation will occur via a competitive Request for Proposals ("RFP"). Internally, a procurement specialist will work with engineers and others to develop the RFP, which will fully detail the scope of the system need or opportunity for optimization. The RFP will include all technical specifications required to design a solution. Each RFP will have a period during which potential bidders can ask additional questions.

Rhode Island Energy may require a two-stage proposal process, where the first stage requires a letter of intent describing the proposed concept prior to the second stage proposal with complete technical and financial detail. The objective of this two-stage proposal process is to reduce workload and improve proposals by providing an opportunity for Rhode Island Energy to give feedback and express interest (non-interest) in technically viable (non-viable) proposals.

Proposals for Third-Party Solutions

Third-party solution providers may submit proposals for non-wires and non-pipes solutions. RFPs will be posted publicly and can be found by navigating to Rhode Island Energy's System Data Portal.[4] Rhode Island Energy will conduct outreach for each RFP to engage the market in the objective of obtaining a robust set of competitive proposals. Rhode Island Energy will include comprehensive instructions for how potential bidders can submit questions and proposals.

Proposals for Utility-Run Solutions

Program leads representing possibly viable utility-run solutions (i.e., energy efficiency, demand response, renewable energy programs, and energy storage) will be asked to develop proposals in response to the same RFP used to solicit proposals from third-party vendors, subject to the same deadlines, processes, and transparency standards.

Notice to Third-Party Bidders

To aid in transparent processes, the following will be included in each RFP:

"All proposals received by Rhode Island Energy ("RIE") in connection with this Request for Proposals ("RFP") are subject to public disclosure, specifically through filings made by RIE with the Rhode Island Public Utilities Commission ("PUC"). Filings with the PUC are subject to the Rhode Island Access to Public Records Act ("APRA"), R.I. Gen. Laws §38-2-1, et. seq. When making filings with the PUC, RIE will consider all proposals to be public unless RIE, in its discretion, finds that certain portions of information contained within the proposals are exempt from public disclosure pursuant to R.I. Gen. Laws §38- 2-2(4), in which case, RIE may seek confidential treatment from the PUC. Offerors are advised to clearly mark or label "confidential" any portions of information within their proposals that they believe are "[t]rade secrets and commercial or financial information obtained from a person, firm, or corporation which is of a privileged or confidential nature." When making a filing with the PUC, RIE will take into consideration any information marked by the offeror as confidential. However, broad disclaimers that label the entire proposal as confidential will not help RIE in its APRA analysis and may not be considered."

[4] See Section 5 for more information about Rhode Island Energy's System Data Portal.

Step 5. Evaluate Proposals

With the objective of comparing possible solutions on a level playing field, all possible solutions – whether utility-run or third-party provided – are pursued and evaluated in parallel.

First, the procurement specialist will review all proposals to ensure their completeness. On a case-by-case basis, the procurement specialist may notify bidders of incomplete proposals and allow time for bidders to remedy their proposals. Bidders who do not or cannot submit complete proposals will be notified of their disqualification from the procurement process. The procurement specialist will share all complete proposals with members of the Rhode Island Energy evaluation committee, who will be determined prior to issuing the RFP.

All proposals will be evaluated by all members of the evaluation committee using the same evaluation sequence, evaluation criteria, and weighting. Each member will score each proposal; all member scores will be averaged to obtain the final score. The proposal with the highest score will be tentatively selected; all other bidders will be notified of non-selection.

Evaluation criteria is defined and described in the Least-Cost Procurement Standards, Section 1.3.A:

> *"Least-Cost Procurement shall be cost-effective, reliable, prudent, and environmentally responsible. … System Reliability Procurement shall be lower than the cost of the best alternative Utility Reliability Procurement."*

Rhode Island Energy adopts these criteria in its evaluation rubric, shown in Figure 8, below. As a threshold step, any proposal that costs more than the best alternative utility reliability procurement solution identified in Step 3 will be removed from consideration. Rhode Island Energy will conduct its comparison of costs using the stipulations defined in Least-Cost Procurement Standards Section 1.3.H.[5]

Figure 8. System Reliability Procurement Evaluation Rubric

Criteria	Description	Weight
Cost	Total project cost is less than or equal to cost of best alternative Utility Reliability Procurement	Go/No-Go
Cost-Effective	Using the Docket 4600 Benefit-Cost Framework, to what extent do benefits outweigh costs?	25; No-Go if BCR- < 1.0
Reliable	To what extent can the proposal reliably resolve the system need?	25; No-Go if deemed not reliable
Prudent	To what extent would advancing the proposal be considered a prudent decision?	25; No-Go if deemed not prudent
Environ-mentally Respon-sible	To what extent is the proposal environmentally responsible?	25; No-Go if not environ-mentally responsible
	Total	**100**

[5] "Lower than the cost of the best alternative Utility Reliability Procurement i. The distribution company shall compare the cost of System Reliability Procurement measures, programs, and/or portfolios to the cost of the best alternative Utility Reliability Procurement option using all applicable costs enumerated in the RI Framework. The distribution company shall provide specific costs included…"

Step 5. Evaluate Proposals

The evaluation committee will review all remaining proposals and score them based on the extent to which they are cost-effective, reliable, prudent, and environmentally responsible. Rhode Island Energy will conduct its evaluation consistent with the requirements provided by the Least-Cost Procurement Standards in Section 1.3, including adherence to the principles for cost tests and resource assessments in Standards Section 1.3.B.[6] Using the stipulations defined in Least-Cost Procurement Standards Sections 1.3.C, 1.3.D, 1.3.E, and 1.3.F, any proposal that is found to be not cost-effective, reliable, prudent, or environmentally responsible will be removed from consideration.[7]

Of all remaining proposals, Rhode Island Energy will tentatively select the proposal with the highest score for continuation in the system reliability procurement process.

[6] "Least-Cost Procurement Standards Section 1.3.B: "When preparing any cost test or resource assessment, including the RI Test, the following principles will be applied: i. Supply-side and demand-side alternative energy resources…"
[7] The full reference to Least-Cost Procurement Standards Section 1.3 is included in Appendix 3 for easy reference.

Step 5. Evaluate Proposals – Expected Value

Beginning in 2024, Rhode Island Energy will begin exploring how to apply the concept of expected value to its evaluation of proposals for system reliability procurement.

What is expected value?

Expected valuation is a common practice for accounting for probabilities of different outcomes. In essence, the expected value of an action is the sum of its probability-weighted values (see Figure 9).

Expected value may be applied when there are multiple possible outcomes that may result from an action. By applying expected value, we can appropriately internalize the range of likely outcomes; not applying expected value may result in over-valuing (under-valuing) a particular outcome because of the implicit assumption that outcome will result with 100% (0%) certainty.[8]

When to apply expected value?

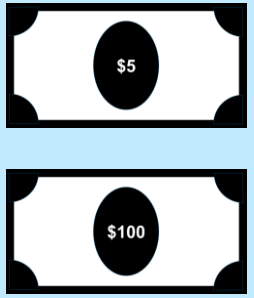
Generally, in the short-term, Rhode Island Energy will apply expected value as a sensitivity analysis in situations where Rhode Island Energy conducts a benefit-cost assessment for investment choices between two alternatives, and for which it is feasible to identify potential outcomes and estimate the probabilities of those outcomes occurring. Rhode Island Energy recognizes that there may be unforeseen complexities that prevent full application of expected value and considers the next few years to be an exploratory, learning experience.

As a first step in this learning experience, Rhode Island Energy will first apply expected value to investment decisions regarding non-wires (non-pipes) solutions relative to wires (pipes) solutions, where the potential outcomes differ in the length of the deferral term of the wires (pipes) solution.

In the longer-term, Rhode Island Energy can potentially apply expected value to more complex decisions, including but not limited to decisions between more than two alternatives and decisions with more than two potential outcomes.

Whenever Rhode Island Energy applies expected value, Rhode Island Energy will document the exact method for each step contained in the methodology, all assumptions, and all justifications or underlying evidence required for a reader to understand and replicate the calculations.[9]

Figure 9. Simple illustration of expected value



99% probability of winning $5
(0.99 X $5.00 = $4.95)

PLUS

1% probability of winning $100
(0.01 X $100.00 = $1.00)

EQUALS

Expected Value of $5.75

If you were to assume winning $5 were the only outcome, then you'd be implicitly assuming 100% probability of winning $5 and 0% probability of winning $100, for an expected value of $5.

If you had to buy a lottery ticket to access these winnings, an economically rational person would be willing to pay up to $5.75 to take the bet that recognizes the small, but non-zero chance of winning $100; up to $0.75 more than an economically rational person who considers only 100% chance of winning $5.

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[8] For more information about expected valuation, see Appendix 8.

[9] Subject to protection of confidential data and sources.

Step 6. Request Regulatory Approval

If the evaluation in Step 5 results in a proposal that is less costly than the best alternative utility reliability procurement and is cost-effective, reliable, prudent, and environmentally responsible, then Rhode Island Energy will file for regulatory approval of the system reliability procurement solution.

Figure 10 provides examples of which regulatory avenues Rhode Island Energy may pursue for approval for various solutions, where the wires or pipes solution (yellow row) represents the best alternative utility reliability procurement solution and subsequent rows (gray) represent system reliability procurement.

Figure 10. Examples of filings through which regulatory approval may be requested for an incomplete set of potential solutions to system needs or optimization

Solution Description	Regulatory Filing	Timing of Filing
Wires or Pipes Solution	Electric or Gas Infrastructure, Safety, and Reliability (“ISR”) Plan	Annual filing each December
Third-Party Solution (Technology Agnostic)	SRP Investment Proposal	December, alongside ISR Plan
Utility-Administered Energy Efficiency	SRP Investment Proposal	December, alongside ISR Plan
Utility-Administered Demand Response	SRP Investment Proposal	December, alongside ISR Plan
Utility Owned and Operated Energy Storage	Electric ISR Plan	Annual filing each December
Renewable Energy Incentives	Renewable Energy Growth Program (zonal incentive)	Annual filing each November

Step 7. Implement Solution

Pending regulatory approval, Rhode Island Energy will proceed expeditiously with the system reliability procurement solution. Any third-party solution will require an executed contract between the third party and Rhode Island Energy.

Contracts for third-party system reliability procurement solutions may include terms and conditions covering performance expectations, penalties for non-performance, and data sharing and transparency. An example of such language is below for reference:

"[Vendor] acknowledges that the Rhode Island System Reliability Procurement Program ("Program") is funded by Rhode Island customers through the energy efficiency surcharge on their bills [or other rate mechanism]. [Vendor] agrees to cooperate with Rhode Island Energy ("RIE") and provide any documentation and/or data related to the Program in its possession to RIE for purposes of ensuring that RIE can (i) comply with any directives issued by the Rhode Island Public Utilities Commission ("PUC") or other authorized governmental agency and (ii) respond to any data requests made by the PUC or other governmental agency. [Vendor] also agrees that such documentation and/or data as well as this Agreement may be publicly filed by RIE in regulatory proceedings related to the Program. [Vendor] further agrees to comply with all requirements as reasonably deemed necessary by RIE to ensure that [Vendor] is qualified to serve as a vendor within the Program."

<u>Reporting and Continuous Improvement</u>
Rhode Island Energy is committed to robust procurement and evaluation of system reliability procurement solutions.

To promote transparency, Rhode Island Energy will report results of all procurements, including assessments of the viability of utility-administered solutions. Such reporting will be included within System Reliability Procurement Annual Reports. For more information, see Section 7 of this 2024-2026 SRP Three-Year Plan.

In the spirit of continuous improvement, Rhode Island Energy always encourages and accepts feedback from third-party solution providers, including both bidders and non-bidders. To provide feedback, please email Carrie Gill, Head of Electric Regulatory Strategy: cagill@rienergy.com.

Section 3. Electric System Needs and Optimization

Reducing Supply Costs through Electric Demand Response

Rhode Island Energy™
a PPL company

System Need or Optimization

Electricity supply costs are partially driven by the high cost of electricity during the few hours of the year when we use the most electricity. During these "peak periods," the most expensive generators are needed to supply enough electricity to meet demand, and their cost is factored into the supply rates customers incur.

Although Rhode Island Energy is an electricity delivery company (akin to FedEx or UPS for delivering packages), we are obliged to help customers who choose not to buy supply from a third-party supplier by buying electricity in bulk on the wholesale market. Rhode Island Energy cares about helping customers access the most affordable electricity and, as such, has identified an opportunity to reduce supply costs by incentivizing demand reductions during peak periods.

SRP Electric System Screening Criteria

This optimization meets all four electric system screening criteria and is, therefore, an opportunity for system reliability procurement:

1. The optimization is not related to an asset condition issue;
2. The optimization is eligible because the optimization requires load relief;
3. The opportunity for system reliability procurement is likely to garner sufficient market interest; and
4. There is adequate time to implement a system reliability procurement solution.

Best Alternative Utility Reliability Procurement Solution

Demand response proposed for this system need is specifically to reduce system-level peak demand. There is no best alternative utility reliability procurement solution at this time.[10,11]

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[10] Rhode Island General Laws 39-1-27.7.b(1)(iii) establishes "demand response, including, but not limited to, distributed generation, back-up generation, and on-demand usage reduction, that shall be designed to facilitate electric customer participation in regional demand response programs, including those administered by the independent service operator of New England ("ISO-NE"), and/or are designed to provide local

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system reliability benefits through load control or using on-site generating capability" as an eligible activity within system reliability procurement.

[11] The current demand response program is not capable of managing loads in response to circuit peaks because the current demand response program does not have the necessary inputs, including localized data, to sufficiently manage the distribution system with the existing

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software/systems. Rhode Island Energy's Grid Modernization Plan analysis identified a need to dispatch demand response resources with an understanding of both localized resource characteristics and system topology. The current system is incapable of doing this for two reasons. First, the current electric system does not have the requisite equipment (sensors, meters, etc.) to provide the data required to understand system topology. Second, the current demand response management system does not have the functionality to pair these two attributes (resource characteristics and system topology). The proposed grid modernization investments include the requisite equipment to provide the data required to understand the system topology and associated limitations on a granular basis. This understanding will provide incremental benefits, such as having the ability to provide localized solutions to address system needs, which will increase the impact of the existing demand response programs. Rhode Island Energy recognizes circuit-focused peak load management is an important functionality for achieving the State's climate and clean energy mandates safely, reliably, and affordably. Rhode Island Energy notes that its proposed grid modernization, our demand response program can be improved to (1) be tied not only to peak load reduction, but also to peak generation management; (2) be tied to distribution system constraints for better infrastructure avoidance; and (3) be integrated and scaled to levels commensurate with State policy drivers. Furthermore, Rhode Island Energy's proposed advanced metering functionality will (i) provide more granular and timely meter data; (ii) improve the Company's ability to dispatch resources; and (iii) allow for more accurate measurement and evaluation of performance. The granular data provided by these investments would be used with the grid modernization investments to provide system-wide real time visibility.

Reducing Supply Costs through Electric Demand Response

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Solicit and Evaluate System Reliability Procurement Proposals

This system reliability procurement opportunity has been addressed since 2019 through the Company's demand response program, branded ConnectedSolutions.[12] As of July 2023, approximately 8,000 customers are participating in ConnectedSolutions through their connected thermostats, battery energy storage systems, and production process curtailments. In aggregate, the participation of these customers has led to a meaningful reduction in peak load resulting in $74 million in costs avoided for our customers. To leverage the value of program continuity, Rhode Island Energy proposes to maintain ConnectedSolutions through 2026.[13]

To administer ConnectedSolutions, Rhode Island Energy partners with a number of curtailment service providers, contracts with a residential demand response vendor, and collaborates with major distribution utilities throughout the region to coordinate demand response events. Rhode Island Energy will continue to coordinate with and grow this ecosystem of third-parties, participants, and partner utilities to increase collective demand reduction and resulting benefits.

Request Regulatory Approval

Rhode Island Energy will request regulatory approval for ConnectedSolutions via a *System Reliability Procurement ("SRP") Investment Proposal* to be filed in December alongside, but separately from, the *Electric Infrastructure, Safety, and Reliability ("ISR") Plan*.[14] The SRP Investment Proposal will include program design specifications, budget, and anticipated participation and impacts. Additional discussion and details about the proposed trajectory of ConnectedSolutions is in Appendix 3.

Implement Solution

Pending regulatory approval, Rhode Island Energy will reopen ConnectedSolutions for the 2024 peak demand season, beginning in Spring 2024. Rhode Island Energy will report the resulting impacts in its *SRP Annual Report*.[15]

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[12] ConnectedSolutions had previously been housed within filings related to energy efficiency (e.g., *2021-2023 Energy Efficiency Three-Year Plan*, *2023 Energy Efficiency Annual Plan*). Beginning in 2024, Rhode Island Energy will include ConnectedSolutions within filings related to system reliability procurement instead.

[13] Although this *2024-2026 SRP Three-Year Plan* only pertains to activities through 2026, Rhode Island Energy does envision the continuation of a demand response program past 2026, subject to future design modification and appropriate regulatory review.

[14] As is recommended by the Least-Cost Procurement Standards (2023 version) Section 5.5.A.

[15] For more information on annual reporting, see Section 7.

Improving Reliability in Woonsocket

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System Need or Optimization

In the Blackstone Valley South Area Study, Rhode Island Energy identifies a system need on a feeder in Woonsocket (excerpt below).[16]

Electric System Screening Criteria

This optimization meets all four electric system screening criteria and is, therefore, an opportunity for system reliability procurement:

1. The optimization is not related to an asset condition issue;
2. The optimization is eligible because the optimization requires load relief;
3. The opportunity for system reliability procurement is likely to garner sufficient market interest; and
4. There is adequate time to implement a system reliability procurement solution.

Best Alternative Utility Reliability Procurement Solution

As discussed in the Area Study, above, the best alternative utility reliability procurement solution involves reconductoring approximately one mile of cable. This solution is anticipated to cost $1.1 million.

Next Step: Solicit System Reliability Procurement Proposals

Rhode Island Energy plans to develop and issue an RFP for this system reliability procurement opportunity in 2024.

Feeder 112W43 Reconductoring Options 1

Reliability can be improved by reconductoring ~5,340' of cross arm and armless to spacer cable along West Wrentham Road from pole #35 to pole #82. Refer to Appendix 7.6 for detailed plan development drawings. The wires solution should be further investigated. An infrared scan of the OH distribution equipment was completed in May 2021 and the issues have been resolved. Tree trimming was performed in FY20.

Spend	Cost ($M)
CapEx	$ 1.000
OpEx	$ 0.020
Removal	$ 0.080
Total	$ 1.100

Feeder 112W43 Non-wire Alternative Option 2

There is approximately 94% of total feeder connected kVA and 93% of total feeder customers past the reconductored section mentioned in Option 1. Based on the assessment of applicability of non-wires alternatives, the preferred solution may be a good candidate to go to market for an NWA solution. The NWA solution is currently being evaluated internally. Due to the ongoing NWA review, the wires solution cost identified above will not be included in the cost summary table below and in section 7.

[16] See page 34, available here: https://systemdataportal.nationalgrid.com/RI/documents/Blackstone_Valley_South_Area_Study_Report_Rev1_final_signed_redacted.pdf

Section 4. Gas System Needs and Optimization

Gas Demand Response

System Need or Optimization
During the coldest days of the year, forecasted peak demand may exceed pipeline capacity, resulting in capacity-constrained areas on the system.

SRP Gas System Screening Criteria
This system need is not related to an asset replacement investment. It qualifies as an eligible system need or optimization, is likely to garner sufficient market interest, and there is adequate time to implement a system reliability procurement solution. Therefore, this system need passes the gas system screening criteria and is a system reliability procurement opportunity.

Best Alternative Utility Reliability Procurement Solution
Gas demand response is a pilot program. We are trying to understand the scalability of the program and the degree to which it might offset a utility reliability procurement. Hence, it is not appropriate to evaluate the pilot program against a utility reliability procurement solution at this time.

Solicit System Reliability Procurement Proposals
For this system need, Rhode Island Energy administers a demand response pilot program for large, firm commercial and industrial customers, specifically those customers with gas equipment that can be curtailed without compromising safety. The demand response pilot program incentivizes the deferral or avoidance of gas use during peak periods through adjusting thermostat settings or by temporarily switching to an alternative, back-up heating source. Testing the efficacy of gas demand response will allow Rhode Island Energy to understand gas demand response's impact on gas system needs and optimization, customer interest, effectiveness of incentive levels, and scalability of the program, as well as its potential applicability to other customer classes.

Evaluate Possible Solutions
Gas demand response may have the potential for many system benefits and value streams, such as alleviating local distribution system constraints, increasing system flexibility, delaying infrastructure investments, and providing revenue to participants. The gas demand response pilot program will target 40-50 dekatherms ("Dth") of hourly peak demand reduction in the winter of 2023/2024. While gas demand response does not directly address climate change, greenhouse gas emissions may be reduced due to participation during peak demand events and may help avoid gas infrastructure investments.

Request Regulatory Approval
Rhode Island Energy will request regulatory approval for its gas demand response pilot program via a *System Reliability Procurement Investment Proposal* to be filed in December alongside, but separate from, the *Gas Infrastructure, Safety, and Reliability ("ISR") Plan*. The *SRP Investment Proposal* will include program design specifications, budget, and anticipated participation and impacts. We discuss further details about the trajectory of the demand response program in Appendix 3.

Implement Solution
In its *SRP Investment Proposal*, Rhode Island Energy will propose the continuation of – and potential expansion to include residential customers with hybrid gas-electric heating systems – its gas demand response pilot program during peak gas demand season beginning in winter 2024. Rhode Island Energy will report the resulting impacts of its demand response program in its SRP Annual Reports.[17]

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[17] See Section 7 for more information about annual reporting.

Section 5. Market and Stakeholder Engagement

Engagement for Solicitations

In service to the objective of evaluating all possible solutions on a level playing field, Rhode Island Energy is interested in ensuring all competitive proposals are presented. To mitigate risk of an otherwise viable solution not being proposed due to lack of awareness about an RFP, Rhode Island Energy will conduct outreach for its system reliability procurement RFPs in the following ways:

1. Rhode Island Energy will post all RFPs for system reliability procurement publicly on the System Data Portal website.
2. Rhode Island Energy will email its list of third-party vendors when the RFP is issued and in reminder prior to the due date.
3. Rhode Island Energy will notify the System Reliability Procurement Technical Working Group so that members may conduct outreach to their constituents and colleagues.
4. Rhode Island Energy will notify the Energy Efficiency Technical Working Group so that members may conduct outreach to their constituents and colleagues.
5. Rhode Island Energy will make announcements at meetings of the Energy Efficiency and Resource Management Council and the Distributed Generation Board.

Rhode Island Energy welcomes ideas from potential bidders for other avenues of outreach that would be beneficial.

System Data Portal

Rhode Island Energy maintains an interactive website where third parties can access information about the electric distribution system, called the "System Data Portal." The primary objective of the System Data Portal is to use information to nudge development of distributed energy resources to locations on the grid that provide relatively more operational value. An ancillary benefit is that developers can gain insight into potential development locations that may result in relatively low interconnection costs and/or relatively quick interconnection times. Appendix 3 contains more information about how to use the System Data Portal, including specific use cases for various stakeholders including distributed generation developers, electric vehicle charging infrastructure developers, and building developers.

Rhode Island Energy is in the process of migrating the System Data Portal from National Grid's servers to PPL's servers, expected to be complete by May 2024. This migration will preserve all key components of the System Data Portal, including Company Reports, Distribution System Data Map, Heat Map, and Hosting Capacity Map, all of which will be updated by the end of the first quarter of each year on an ongoing basis.

Rhode Island Energy will make the following changes and improvements to the System Data Portal:

- Solicitations for System Reliability Procurement will be housed within the Company Reports tab instead of the tab currently titled "NWA." By housing all relevant materials together (i.e., solicitations, area studies, and the 2024-2026 SRP Three-Year Plan), we hope third-party solution providers and potential bidders can more easily access pertinent information for beneficial development of distributed energy resources and successful proposals for non-wires solutions.

- Equivalent materials for the gas distribution system and solicitations for non-pipes solutions will be added to the Company Reports tab.

- Rhode Island Energy will remove the fleets layer from the heat map, but add a map showing loading hosting capacity. The original objective of this layer was to help third parties identify fleets that could potentially be electrified. However, there is no compelling evidence that the fleet layer is actively used and there are administrative challenges with updating the layer. Instead, we will add a full map tab showing loading hosting capacity on each feeder. This layer will provide third parties information about which feeders may have the capacity to accommodate electric vehicle charging infrastructure with relatively low interconnection cost.

- Rhode Island Energy will remove the tab "SLR," which shows projections of sea level rise using data sourced from the National Oceanic and Atmospheric Administration. To aid third parties in developing distributed energy resources in locations with lower climate risk, Rhode Island Energy will add layers to each map tab that allow users to toggle on/off map layers from Rhode Island's STORM TOOLS, a suite of maps that show coastal flooding for various levels of storm and sea level rise that is used by the Coastal Resources Management Council. Rhode Island Energy recognizes the importance of climate resilience and climate adaptation for our energy resources and welcomes suggestions for other useful map overlays on an ongoing basis.

System Reliability Procurement Technical Working Group

The SRP Technical Working Group (TWG) is an external stakeholder group convened and administered by Rhode Island Energy for the sole purpose of advising Rhode Island Energy on matters related to System Reliability Procurement, as defined by Least-Cost Procurement Statute under RIGL 39-1-27.7. The SRP TWG is not a statutory or regulatory requirement, nor is the group public. Members of the SRP TWG include the Rhode Island Division of Public Utilities and Carriers, Rhode Island Office of Energy Resources, Energy Efficiency and Resource Management Council, Acadia Center, Green Energy Consumers Alliance, Northeast Clean Energy Coalition, and Conservation Law Foundation.[18] Rhode Island Energy will continue to convene the SRP TWG throughout 2024-2026. Topics of discussion for this time period may include but are not limited to process improvements for system reliability procurement solicitations and evaluations, review of SRP Investment Proposals and SRP Annual Reports, improvements for the System Data Portal, and other topics to be identified. For more information about the SRP TWG, please email Carrie Gill at cagill@rienergy.com.

[18] While Commerce RI, Rhode Island Office of the Attorney General, and Rhode Island Infrastructure Bank have been members and are welcome to continue to participate, there are currently no representatives from these organizations who are active in the SRP TWG.

Section 6. Performance Incentive Plan – *forthcoming*

Section 7. Annual Reporting

Annual Reporting

Rhode Island Energy will submit an SRP Annual Report to the Rhode Island Public Utilities Commission by June 1 of each year covering activities completed within the prior calendar year (e.g., the *2024 SRP Annual Report* will cover activities conducted January 1 through December 31, 2024, and will be submitted by June 1, 2025). With the dual objectives of transparently reporting activities to interested stakeholders and holding the Company accountable, each annual report will include the following information:

- Results of screening for electric and gas system reliability procurement opportunities, with any opportunities added to a comprehensive listing of opportunities with summary information about system needs or optimization and next step/date of next step (akin to the descriptions provided in Sections 3 and 4);
- A summary of any major changes to the System Data Portal (beyond routine updating of data);
- A summary of engagement with the SRP Technical Working Group; and
- A description of any proposed changes to process, funding, performance incentive, annual reporting, or any other system reliability procurement activity with a justification for the proposed change and any request regulatory ruling related to the proposed change.

Section 8. Consistency with LCP Standards

Consistency with LCP Standards

In this section, Rhode Island Energy discusses how the 2024-2026 SRP Three Year Plan –specifically the proposed system reliability procurement process – is consistent with the requirements of Least-Cost Procurement Standards Section 1.3. Key excerpts are copied below for easy and direct reference.

Rhode Island Energy will include detailed discussion and documentation (where appropriate) specific to each System Reliability Procurement Investment Proposal to evince its adherence to Least-Cost Procurement Standards Section 1.3.

Least-Cost Procurement Standards Section 1.3.A

"Least-Cost Procurement shall be cost-effective, reliable, prudent, and environmentally responsible. … System Reliability Procurement shall be lower than the cost of the best alternative Utility Reliability Procurement."

The evaluation step of the system reliability procurement process described in Section 2 Step 5 of this Plan is consistent with Standards Section 1.3.A because the evaluation criteria are structured such that any proposed system reliability procurement solution that is not cost-effective, reliable, prudent, environmentally responsible, and lower than the cost of the best alternative utility reliability procurement solution is removed from further consideration. The proposed system reliability procurement process and evaluation criteria guarantee consistency with Standards Section 1.3.A.

Least-Cost Procurement Standards Section 1.3.B

"When preparing any cost test or resource assessment, including the RI Test, the following principles will be applied: i. Supply-side and demand-side alternative energy resources shall be compared in a consistent and comprehensive manner. ii. Cost tests shall be created using the RI Framework and account for applicable policy goals, as articulated in legislation, PUC orders, regulations, … assessed. iv. Cost tests shall be symmetrical, for example, by including both costs and benefits for each relevant type of impact. v. Analyses of the impacts of investments shall be forward-looking, capturing the difference between costs and benefits that would occur over the life of the investments with those that would occur absent the investments. Sunk costs and benefits are not relevant to a cost-effectiveness analysis. vi. Cost tests shall be completely transparent and should fully document and reveal all relevant inputs, assumptions, methodologies, and results."

The system reliability procurement process described within Section 2 of this Plan includes a step for evaluating system reliability procurement proposals. Within this step, Rhode Island Energy describes its adherence to the principles put forth in Standards Section 1.3.B. In this manner, the Plan is consistent with this requirement of the Standards.

Consistency with LCP Standards

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Least-Cost Procurement Standards Sections 1.3.C-F
These sections stipulate criteria that shall or may be used in the assessment of the extent to which system reliability procurement solutions are cost-effective, reliable, prudent, and environmentally responsible.

The stipulations for determining cost-effectiveness are built into the system reliability procurement process in evaluation of system reliability procurement project proposals. Rhode Island Energy describes its adherence to the Least-Cost Procurement Standards in Section 2 Step 5.

Least-Cost Procurement Standards Section 1.3.H
"Lower than the cost of the best alternative Utility Reliability Procurement i. The distribution company shall compare the cost of System Reliability Procurement measures, programs, and/or portfolios to the cost of the best alternative Utility Reliability Procurement option using all applicable costs enumerated in the RI Framework. The distribution company shall provide specific costs included in the Cost of System Reliability Procurement. ii. At a minimum, the comparison shall include the applicable cost categories in a Total Resources Cost Test. iii. The distribution company shall describe which costs in the RI Framework were included in the cost of System Reliability Procurement and which costs are included in the alternative Utility Reliability Procurement. For any categories that are not included in either, the distribution company shall describe why these categories are not included."

Rhode Island Energy explicitly commits to adhere to Least-Cost Procurement Section 1.3.H in its assessment of the cost of the system reliability procurement solution relative to the best alternative utility reliability procurement solution.[20]

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[20] Least-Cost Procurement Section 1.3.H is the relevant section for System Reliability Procurement; Section 1.3.G is relevant for Energy Efficiency and, as such, is not included for discussion herein.

Section 9. Request for Ruling – *forthcoming*

Request for Ruling – *forthcoming*

For reference: per LCP Standards (2023) Chapter 4.5 (Docket No. 23-07-EE)

A. The PUC will approve screening requirements and implementation plans that meet the Standards herein.

B. The PUC will approve annual reporting requirements that meet the standards herein.

C. The PUC may approve a three-year performance incentive plan for System Reliability Procurement.

D. The PUC will order adoption of any other proposals supported by the Plan and consistent with Least-Cost Procurement, and all applicable statutes, rules, and policies.

Appendices

Appendices

Appendix 1.	Slide Deck Format of *2024-2026 SRP Three-Year Plan – forthcoming*
Appendix 2.	Notes on Terminology – drafted
Appendix 3.	Legal and Regulatory Basis – drafted
Appendix 4.	Preliminary Conceptual Drafts of SRP Investment Proposals – *forthcoming*
Appendix 5.	System Data Portal – *forthcoming*
Appendix 6.	Electric System Reliability Procurement Benefit-Cost Assessment Model – *forthcoming*
Appendix 7.	Electric System Reliability Procurement Technical Reference Manual – *forthcoming*
Appendix 8.	Gas System Reliability Procurement Benefit-Cost Assessment Model – *forthcoming*
Appendix 9.	Gas System Reliability Procurement Technical Reference Manual – *forthcoming*
Appendix 10.	Expected Valuation – drafted

A4. Drafts of SRP Investment Proposals

Rhode Island Energy will file:

- An *SRP Investment Proposal* for Electric Demand Response alongside, but separate from, the *FY2025 Electric Infrastructure, Safety, and Reliability ("ISR") Plan* in December 2023; and
- An *SRP Investment Proposal* for a Gas Demand Response Pilot Program.

Drafts of these proposals will be available for external review and comment within the next version of this Plan due to external stakeholders September 6, 2023. Revised proposal drafts will also be included as an appendix in the *2024-2026 SRP Three-Year Plan* to be filed with the Rhode Island Public Utilities Commission on or before November 21, 2023.

A5. System Data Portal

The objective of this appendix is to assist potential users with how to use the System Data Portal.

A6-A9. BCA Models and TRMs

No proposed changes.