

Comment Letter

To: Rhode Island Public Utility Commission
From: RI Energy Efficiency and Resource Management Council
Date: May 20, 2021
Subject: SRP 2020 Year-End Report Comment Letter



STATE OF RHODE ISLAND
**ENERGY EFFICIENCY &
RESOURCE MANAGEMENT COUNCIL**

INTRODUCTION

National Grid has finalized the System Reliability Procurement (SRP) 2020 Year-End Report (the Report) after receiving feedback from stakeholders on a first draft report. The Report contains several proposed programmatic changes related to the Rhode Island Non-Wires Alternatives (NWA) Benefit Cost Analysis (BCA) Model and Technical Reference Manual (TRM) and the Non-Pipes Alternatives (NPA) Screening Criteria & Evaluation Process, as well as updates on 2020 SRP Commitments, current NWA Opportunities, Portal Enhancements, Market Engagement Activities, and other content.

This letter provides the Rhode Island Energy Efficiency and Resource Management Council's (the Council) comments on the Report, which are summarized below.

COMMENTS

- 1) The Council has no comments or concerns regarding the suggested modifications to the NWA BCA Model or associated TRM.
- 2) The Council recommends providing increased clarity regarding the purpose and application of characterizing NPA projects as either 'small' or 'large' or removing this distinction. This approach is not used in NWA proceedings and does not appear to carry operational significance as defined.
- 3) The Council recommends providing increased clarity regarding several other aspects of the proposed NPA Screening Criteria & Evaluation Process, which were raised during review of the first draft of the Report and not fully addressed in the final draft. For example, more information is needed regarding the process and justification for the proposed option for National Grid to impute additional costs to individual NPA project proposals during evaluation.
- 4) The Council notes that the NPA program is still in development and wishes to ensure continued expeditious progress building out the overall NPA program. Consequently, the Council views the continued NPA program development process as an appropriate venue for addressing the remaining comments that were not fully addressed, and notes that all elements of the NPA program proposed in the Report may be appropriate to revisit and adjust in future as the overall NPA program is further developed.
- 5) The Council has no comments on other aspects of the Report.

RECOMMENDATION

The Council recommends approval of the System Reliability Procurement 2020 Year-End Report, acknowledging that remaining comments provided by the Council's Consultant Team and other stakeholders can be addressed as part of the continued development of the NPA program.