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June 5, 2018

Ms. Luly Massaro, Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
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Re: Docket No. 4770 - The Narragansett Electric Co. D/B/A National Grid's Application To Change Electric and Gas Base Distribution Rates

Docket No. 4780 - The Narragansett Electric Co. D/B/A National Grid's Proposed Power Sector Transformation (PST) Vision And Implementation Plan

Dear Ms. Massaro:

Enclosed please find an original and nine copies of the following documents:

1. Settlement Testimony of Nathan Phelps and Ronald J. Binz on behalf of the Northeast Clean Energy Council and the Conservation Law Foundation (Exhibit NECEC-CLF-3); and,
2. The Northeast Clean Energy Council's Exhibit List for the Settlement Hearings.

Please note that electronic copies of these documents have been provided to the service lists in the above captioned dockets.

Thank you for your attention to this matter.

Sincerely,



Joseph A. Keough, Jr.

JAK/kf

Enclosures

cc: Docket 4770 and 4780 Service Lists (*via electronic mail*)

STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION

THE NARRAGANSETT ELECTRIC *
COMPANY d/b/a NATIONAL GRID * Docket 4770
APPLICATION TO CHANGE *
ELECTRIC AND GAS *
BASE DISTRIBUTION RATES *

THE NARRAGANSETT ELECTRIC *
COMPANY d/b/a NATIONAL GRID * Docket 4780
PROPOSED POWER SECTOR *
TRANSFORMATION (PST) VISION *
AND IMPLEMENTATION PLAN *

Consolidated

* * * * *

SETTLEMENT TESTIMONY

OF

NATHAN PHELPS

AND

RONALD J. BINZ

ON BEHALF OF
NORTHEAST CLEAN ENERGY COUNCIL (NECEC), AND
CONSERVATION LAW FOUNDATION (CLF)

June 5, 2018

Table of Contents

- I. Introduction1
- II. Purpose of Testimony and Summary of Recommendations2
- III. Settlement Provisions4
 - A. Clean Energy Programs4
 - B. Advanced Metering Functionality6
 - C. Regulatory Framework6
- IV. Conclusion and Recommendations9

1 **I. INTRODUCTION**

2 **Q. MR. PHELPS, PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

3 A. My name is Nathan Phelps. My address is 745 Atlantic Ave., 7th Floor, Boston,
4 Massachusetts 02111.

5 **Q. MR. PHELPS, HAVE YOU PREVIOUSLY TESTIFIED IN DOCKET 4780?**

6 A. Yes. On April 25, 2018 I filed direct testimony on behalf of the Northeast Clean
7 Energy Council (“NECEC”) and the Conservation Law Foundation (“CLF”) in
8 Docket 4780, which addresses the Narragansett Electric Company d/b/a National
9 Grid (“National Grid” or “Company”) proposed power sector transformation
10 (“PST”) vision and implementation plan before the Rhode Island Public Utilities
11 Commission (“PUC” or “Commission”). Specifically, my direct testimony
12 addressed: (1) grid modernization; (2) advanced metering functionality (“AMF”);
13 (3) energy storage; and (4) solar and Low-Income customers.

14 **Q. MR. PHELPS, HAVE YOU PREVIOUSLY TESTIFIED IN DOCKET 4770?**

15 A. No.

16 **Q. MR. BINZ, PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

17 A. My name is Ronald J. Binz. My business address is 333 Eudora Street, Denver,
18 Colorado 80220.

19 **Q. MR. BINZ, HAVE YOU PREVIOUSLY TESTIFIED IN DOCKET 4780?**

20 A. Yes. On April 25, 2018 I filed direct testimony on behalf NECEC and CLF in
21 Docket 4780. My direct testimony in Docket 4780 addressed: (1) performance

1 based regulation; (2) performance incentive mechanisms (“PIMs”); and (3) the
2 surrounding regulatory approach, including cost recovery, advocated by National
3 Grid for proposed investments it characterized as PST-related.

4 **Q. HAVE YOU PREVIOUSLY TESTIFIED IN DOCKET 4770?**

5 A. No.

6 **Q. HAVE NECEC AND CLF PREVIOUSLY FILED TESTIMONY IN**
7 **DOCKET 4770?**

8 A. No. Although NECEC and CLF are both parties to Docket 4770, neither party has
9 filed testimony in Docket 4770 before today.

10 **II. PURPOSE OF TESTIMONY AND SUMMARY OF**
11 **RECOMMENDATIONS**

12 **Q. HAVE YOU REVIEWED THE SETTLEMENT AGREEMENT IN**
13 **DOCKETS 4770 AND 4780?**

14 A. Yes, we have reviewed the settlement agreement in dockets 4770 and 4780
15 (“Settlement”).

16 **Q. PLEASE PROVIDE AN OVERVIEW OF THE SETTLEMENT.**

17 A. The Settlement is comprehensive. The Settlement resolves all issues in dockets
18 4770 and 4780, and all parties have agreed to the Settlement. As such, the
19 Settlement is a complete package that addresses the rate case and Power Sector
20 Transformation (“PST”) Implementation Plan filed by the Company, and begins to

1 lay the foundation for the transition to – as requested by Governor Raimondo¹ – a
2 more dynamic regulatory framework that will enable Rhode Island to advance a
3 cleaner, more affordable, and reliable energy system for the 21st century and
4 beyond, e.g., power sector transformation.

5 **Q. DOES YOUR TESTIMONY ADDRESS ALL OF THE ISSUES INCLUDED**
6 **IN THE SETTLEMENT?**

7 A. No, it does not. Our testimony addresses the following topics in the Settlement:
8 (1) clean energy programs; (2) advanced metering functionality; and (3) regulatory
9 framework.

10 **Q. DO NECEC AND CLF SUPPORT THE SETTLEMENT AS FILED?**

11 A. Yes, NECEC and CLF support the Settlement and are signatories to the Settlement.

12 **Q. DO NECEC AND CLF SUPPORT THE SETTLEMENT AS A WHOLE, OR**
13 **JUST THE ISSUES ADDRESSED IN THIS TESTIMONY?**

14 A. NECEC and CLF support the entirety of the Settlement. The testimony included
15 herein addresses topics that we discussed in our previous testimony in Docket 4780,
16 but that does not mean that we view these issues as severable. NECEC and CLF's
17 support for the Settlement is tied to the Settlement as a whole, not to individual
18 provisions.

¹ Letter submitted by Governor Raimondo to the Rhode Island Public Utilities Commission, the Office of Energy Resources, and the Division of Public Utilities and Carriers at 1. Retrieved May 21, 2018. Available at: http://www.ripuc.org/utilityinfo/electric/GridMod_ltr.pdf

1 **Q. WHY DO NECEC AND CLF SUPPORT THE SETTLEMENT?**

2 A. The Settlement is a positive step toward a regulatory framework that encourages
3 the Company to reduce costs and control the long term costs of the electric system
4 (especially infrastructure costs); give customers more energy choices and
5 information; and build a flexible grid to integrate more clean energy generation –
6 the policy and environmental goals of Rhode Island as articulated in the Rhode
7 Island Power Sector Transformation Phase One Report to Governor Gina M.
8 Raimondo.² NECEC and CLF view the Settlement as significant progress in
9 transitioning the regulatory framework to a system that works for all ratepayers and
10 the Company, now and in the future.

11 **Q. PLEASE SUMMARIZE YOUR RECOMMENDATIONS**

12 A. NECEC and CLF recommend that the Commission accept the Settlement in full,
13 and as filed.

14 **III. SETTLEMENT PROVISIONS**

15 **A. Clean Energy Programs**

16 **Q. PLEASE DESCRIBE THE CLEAN ENERGY PROGRAMS IN THE**
17 **SETTLEMENT.**

18 A. The Settlement makes the following changes to the clean energy programs
19 proposed by the Company: (1) removes the Solar Demonstration Program;

² Accessed on June 3, 2018. Available at:
http://www.ripuc.org/utilityinfo/electric/PST%20Report_Nov_8.pdf

1 (2) removes the Income Eligible Customer Rewards Program; and (3) modifies the
2 Energy Storage Demonstration proposal, consistent with recommendations in Mr.
3 Phelps' initial testimony in Docket 4780.³ In addition, it modifies the Electric
4 Transportation proposal; modifies the Electric Heat proposal; and creates a
5 provision for the engagement and guidance of future steps to transform the power
6 sector.

7 In regard to the energy storage proposal, we note that the Company is required to
8 engage third parties and facilitate third-party and customer ownership of storage,
9 in part by issuing a request for proposals ("RFP") for all deployment, including
10 within a utility-owned framework, with the option for third party-ownership. In
11 addition, the creation of a PST Advisory Group made up of stakeholders, including
12 a clean energy industry representative, will provide a forum for the Company and
13 other parties to work collaboratively on the implementation of the current
14 settlement and on future steps to implement power sector transformation.

15 **Q. HOW WILL THE SETTLEMENT AFFECT THE DEPLOYMENT OF**
16 **DISTRIBUTED ENERGY RESOURCES IN RHODE ISLAND?**

17 A. Consistent with our testimony in Docket 4780, the Settlement includes provisions
18 that require the Company to facilitate the development of distributed energy
19 resources ("DER"), maximizing the use of competitive markets, particularly
20 competitive procurements for DER. The Settlement further directs the opportunity
21 for Company-owned clean energy infrastructure such as electric vehicle charging

³ See Exh. NECEC-CLF-1 at Bates 28-35.

1 to market segments that are currently underserved. As such, the Company's
2 involvement with DER should help the competitive DER market grow and mature.

3 **B. Advanced Metering Functionality**

4 **Q. PLEASE DESCRIBE AMF IN THE SETTLEMENT.**

5 A. The Settlement requires the Company to file an updated AMF business case no later
6 than December 1, 2018 with the Commission. The Company will work
7 collaboratively with the Division, OER, and the PST Advisory Group in revising
8 the AMF business case before the filing with the Commission.

9 **Q. HOW WILL THE SETTLEMENT AFFECT THE DEPLOYMENT OF AMF**
10 **IN RHODE ISLAND?**

11 A. The Settlement will better enable the Company to – eventually – start to deploy
12 AMF throughout their service territory. AMF is essential to modernizing the
13 electric distribution system, and enabling customers to change their behavior as a
14 result of more sophisticated rate designs. Stated another way, the PST initiative is
15 not possible without AMF.

16 **C. Regulatory Framework**

17 **Q. HOW WILL THE SETTLEMENT AFFECT THE REGULATORY**
18 **FRAMEWORK IN RHODE ISLAND?**

19 A. The current regulatory framework is based on rate base rate-of-return regulation.
20 The Settlement starts the transition to performance-based revenue cap regulation,

1 essentially through the “Grand Bargain” process for developing an improved
2 regulatory outcome, as described by Mr. Binz.⁴ The Settlement starts the transition
3 primarily through two provisions: (1) a multi-year rate plan; and (2) an initial set of
4 performance incentives.

5 **Q. WHY IS THE SETTLEMENT A TRANSITION?**

6 A. Performance-based revenue cap regulation is new to Rhode Island. In order to allow
7 all parties an opportunity to become familiar with performance-based revenue cap
8 regulation and the Commission to ensure that the results are appropriate for
9 ratepayers, the Settlement begins the process of moving Rhode Island deliberately
10 from rate base rate-of-return regulation to performance-based revenue cap
11 regulation, allowing all parties – including the Commission – an opportunity to
12 learn and make adjustments in subsequent iterations. As the Settlement notes,
13 “[t]his Settlement Agreement represents a starting point for the role of performance
14 incentive mechanisms in Rhode Island, which the Settling Parties expect will grow
15 over time both in terms of their financial importance and their role in driving
16 important outcomes.”⁵ NECEC supports the Settlement as a first step in the process
17 to move to a performance based regulatory framework that will align the
18 Company’s, customers’ and public policy objectives to reduce costs, increase
19 choices and build a more flexible grid that integrates more clean energy resources.
20 Ultimately, Rhode Island’s transition to performance-based revenue cap regulation

⁴ See Exh. NECEC-CLF-2 at Bates 15, lines 9-10.

⁵ Settlement at § 19.

1 will be based on the experience of what works well (and by extension, what does
2 not work well) in Rhode Island.

3 The iterative approach is especially important for PIMs. The Settlement includes a
4 limited number of PIMs with financial consequences for the Company as well as
5 the collection of data on scorecard metrics to develop additional PIMs in the future
6 as part of the first step toward a performance-based regulatory framework. The
7 Office of Energy Resources, the Division of Public Utilities and Carriers, the
8 Commission, and other stakeholders should be able to build upon the experience
9 learned from the implementation of the PIMs and the scorecard metrics in the
10 Settlement to move toward the future where the Company's compensation will
11 increasingly be tied to such PIMs. Ideally, the experience from the PIMs in the
12 Settlement will result in future PIMs that motivate the Company to achieve
13 outcomes that are beneficial for Rhode Island. As such, the PIMs in the Settlement
14 are the first step in performance based ratemaking that should benefit Rhode Island
15 for decades to come.

16 **Q. IN THE SETTLEMENT, HOW ARE THE COSTS ASSOCIATED WITH**
17 **PST RECOVERED?**

18 A. Consistent with both Mr. Phelps'⁶ and Mr. Binz's testimony,⁷ the costs associated
19 with PST programs are recovered in base rates. The Settlement does not allow for
20 a separate PST tracker in order to recover costs associated with PST programs.

⁶ See Exh. NECEC-CLF-1 at Bates 19-28.

⁷ See Exh. NECEC-CLF-2 at Bates 38-41.

1

IV. CONCLUSION AND RECOMMENDATIONS

2

Q. PLEASE SUMMARIZE YOUR RECOMMENDATION.

3

A. NECEC and CLF recommend that the Commission accept the Settlement in full,

4

and as filed.

5

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

6

A. Yes, it does.

CERTIFICATION**Docket 4770**

I hereby certify that on June 5, 2018, I sent a copy of the within to all parties set forth on the attached Service List by electronic mail and copies to Luly Massaro, Commission Clerk, by electronic mail and regular mail.

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CERTIFICATION
Docket 4780

I hereby certify that on June 5, 2018, I sent a copy of the within to all parties set forth on the attached Service List by electronic mail and copies to Luly Massaro, Commission Clerk, by electronic mail and regular mail.

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