

Attorney General Peter Neronha  
Office of the Attorney General  
150 South Main Street  
Providence, RI 02903

April 27, 2021

Re: Access to Public Records Act Reply

Dear Mr. Neronha,

We write in reply to OER's answer to the appeal regarding the partial denial of Handy Law LLC's public records request to the Office of Energy Resources ("OER") dated February 4, 2021. Only the attorney general can determine whether OER's refusal to produce public records had the required specificity and properly segregated exempt content from public records. We cannot see the documents to argue that. However, OER's claim that production of documents reflecting its interactions with National Grid would have the effect of chilling OER's deliberative process and its argument that we are dishonest to say that stakeholders were denied access, transparency and response require rebuttal.

Thanks only to this APRA process, the evidence that National Grid has had excessive access to OER while stakeholders have been denied such access is now clear as a matter of record. The trail of NGrid influence is now conspicuous. There is evidence of many meetings with the consultants, NGrid getting confidential advance copies of the draft report and the technical support document and of Director Ucci inviting utility collaboration and even saying it could be provided under a non-disclosure agreement. At the same time, we have consultant emails joking with the Director that the suggestion that stakeholders have no influence is overstated and OER and the DPUC denying our firm any right to interact directly with the consultants. See **Exhibit A**.

Why is such lopsided access a problem? OER's answer opens with a surprising disclaimer that OER has no utility enforcement authority and its report has no weight of law, as if to suggest no influence. The process and report under inspection here is about how RI should achieve its goal of 100% renewable energy by 2030 – it's hard to imagine an energy report that could contain more important or influential recommendations regarding the future of RI energy policy. In substantive part, the report contains a (wholly unsupported) conclusion that local production of renewable energy is subsidized by other ratepayers and a policy recommendation that OER ought to commence a stakeholder process to evaluate ways to reduce the cost of homegrown clean energy (presumably by paying it less than it's worth). This APRA request has revealed that it was not the experienced consultant that set the policy recommendations for this report, that was OER's purview in consultation with National Grid. (**Exhibit B**) This is the agency that claims to lack authority.

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This appeal isn't about whether their conclusion about a subsidy (which is now already baked) is right (it is not), it's about undue influence and lack of transparency in governance. The public comments for this process had not been made public before this APRA request - yet another anomaly of public process and disadvantage to stakeholders. But, this APRA request reveals that many stakeholders voiced concern that OER and its consultants had ignored the many benefits these local projects produce to the transmission and distribution systems which promise to reduce our great cost of operating and maintaining the electrical system (which cost is paid to National Grid). See **Exhibit C** (comments of Acadia, Nature Conservancy, Consumers' Alliance, ASRI, NECEC, Sunrun and Handy Law). There was never any response much less any dialogue on this point. In fact, that concern isn't even mentioned or addressed in the summary of comments that was only produced with the final report. See <http://www.energy.ri.gov/documents/renewable/The%20Road%20to%20100%20Percent%20Renewable%20Electricity%20-%20Brattle%2004Feb2021.pdf> There was no record of evidence to support OER's conclusion that local energy generation costs ratepayers more than the benefit it provides. Thus, we rebut OER's allegation that it is dishonest for us to say that stakeholders were denied access, transparency and response.

The real tragedy in this is that those of us who have long advocated for the local clean energy industry have refuted this utility obfuscation of the benefits of local production of electricity before (see PUC dockets 4563 and 4600). Now we face it from OER and other administrative branches of our own government. In the Episcopal Diocese's APRA process related to PUC docket 4981, the Division of Public Utilities and Carriers claimed a common interest with National Grid that made documents exchanged between them attorney work product. When asked why they assumed the utility position in that docket without any real inquiry into the costs and benefits local renewable energy projects have on our transmission system, they claim harassment and offer yet more unsubstantiated conclusory rhetoric –

the Division and National Grid possess a 'common interest' to ensure that transmission upgrade and study costs that were the subject of Docket No. 4981 are not imposed on ratepayers and/or produce unjust and unreasonable rates. Where National Grid has taken a position that is consistent with ratepayer interests in keeping rates as low as possible, it is particularly 'right and proper' for the Division to consult Company to be able to formulate the Division's own recommendation for submission to the Commission.

Meanwhile, the PUC chair gave a presentation at the Northeast Clean Energy Council's clean energy day in which he laid out the elements of our electric bills, which are dominated by transmission and distribution service charges, and then focused in on the excessive cost of locally produced and net metered clean

energy. See **Exhibit D**. This is all despite state law and policy that makes it abundantly clear that our general assembly has resolved that local generation of clean and renewable energy will save us money while enhancing security and reliability and cleaning up our emissions. See e.g., Energy 2035: Rhode Island State Energy Plan (2015)(promoting renewable energy to enhance energy security, improve cost-effectiveness and reduce greenhouse gas emissions); R.I. Gen. Laws §§39-26.4-1; 39-26.6-1 (purpose “to stimulate economic development; to improve distribution system resilience and reliability; and to reduce distribution system costs”). Why would those charged with the administration of state law and policy so presumptively refute its purposes?

This brings us back around to the urgency of undue utility influence and failed public process. 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. National Grid is a British company. Its U.S. affiliate owns gas transmission and distribution facilities in New York, Massachusetts and Rhode Island; owns and operates electric transmission facilities in upstate New York, Massachusetts, Rhode Island, New Hampshire and Vermont; and is an electric distribution system operator in upstate New York, Massachusetts and Rhode Island. National Grid UK (the parent) spent a total of £3.5 billion on energy infrastructure over one year (Annual Report 2018/2019, hereafter “AR,” p. 30), generating a net revenue increase of 3 percent and increased rate base of 9.2 percent (AR p. 36). U.S. National Grid reported an annual operational profit of £1.724 billion (AR p. 26), spending £2.6 billion on energy infrastructure in its United States regulated markets (AR p. 36). Sixty percent of UK National Grid’s total revenue and seventy four percent of its total infrastructure investment came from upstate New York and part of New England. Most recently we have reports of \$47 million in what appear to be surplus utility transmission charges on the Block Island wind farm project that the utility appears to have assessed to ratepayers (who approved that?). Local renewable energy projects and other non-wires alternatives can and do reduce the demands on and the costs of our transmission and distribution systems and bring down the need for National Grid’s huge and unwarranted infrastructure investments.

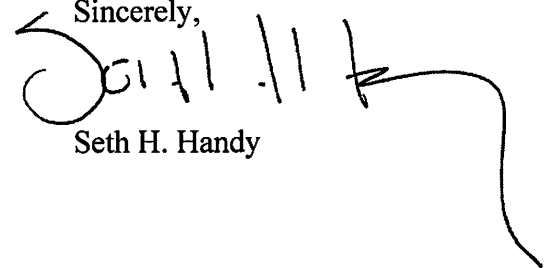
Amidst all of this, OER argues that National Grid is entitled to enhanced access. National Grid is presented as “an essential partner in decarbonization since all in-state renewable energy resources will need to interconnect through National Grid’s distribution or transmission system infrastructure.” OER fails to mention that local clean energy developers have been fighting National Grid tooth and nail for access to its systems on equitable terms in many venues and proceedings for many, many years - see e.g., PUC dockets 4483, 4547, 4973, 4981 (appeal pending), 5090, 5103, 5128, FERC docket EL21-47, H5673, H6066, S699.<sup>1</sup> OER argues that “National Grid’s perspective on opportunities, challenges

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<sup>1</sup> The report actually holds the cost of interconnection as a factor against the cost effectiveness of local clean energy, still without appreciating its cost reducing system benefits.

and limitations are incredibly important to understand.” The utility certainly has a huge economic interest in shaping the direction of RI’s energy future. When will the perspective of local providers of lower cost, clean and secure renewable energy be heard and understood? When will they stop having to push RI’s interests uphill against the will of their own administrative government?

The instrumental question addressed here on appeal of OER’s refusal to produce public records is whether OER has an interest in protecting documents it exchanged with National Grid during the process of developing its policies for reaching 100% renewable energy by 2030 because the production of such documents might “chill OER’s deliberative process.” Any such interest clearly cannot outweigh the public’s interest in fully seeing and understanding the extent of the utility’s influence in this essentially important policy making process.

Sincerely,  
  
Seth H. Handy

c.c. Albert J. Vitali III, Esq.  
Nicholas Ucci – Commissioner, Office of Energy Resources

**Exhibit A**  
The Evidence of Lopsided Access

**From:** [Ucci, Nicholas \(DOA\)](#)  
**To:** [Givens, Sheri](#)  
**Cc:** [George, Linda \(DPUC\)](#); [Sobolewski, Terence](#)  
**Subject:** 100% Renewables  
**Date:** Friday, May 1, 2020 12:32:56 PM

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Hi Sheri, I hope all is well!

We have kicked off our 100% Renewables by 2030 initiative and retained The Brattle Group to support our work pursuant to Governor Raimondo's Executive Order 20-01. In fact, both Jurgen Weiss and Dean Murphy (from HST) will be leading this work, too. Administrator George is also copied here, as the DPUC will be a vital piece of our State Project Team.

Similar to the heating sector initiative, we are committed to collaborating with National Grid as work progresses. In the coming weeks, we will be in touch to arrange for an initial conversation with Brattle to discuss scope of work, etc. and to hear from National Grid on its expectations for (and insights on) the overall project. I anticipate that dialogue continuing, in both public and bilateral settings, throughout the remainder of the year.

In the meantime, it will be important to ensure that we have access to accurate data to inform modeling and prospective quantitative and qualitative analyses. We are hopeful that National Grid will support us in this effort. Such (confidential) data may include, but is not limited to, energy production/deliveries and capacity associated with projects under contract (both DG and LTC), RES compliance costs, contract prices, load forecasts, etc.

While some of this data is already accessible to OER and/or the DPUC through other channels, I thought it might be best for OER, DPUC, and The Brattle Group to execute a project-specific NDA with National Grid to cover all data that might be requested/shared throughout the course of the project.

Would this be amenable to you and your team?

Thank you for your consideration.

Warmest Regards,  
Nick

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**Nicholas S. Ucci**  
*Acting Commissioner*  
**Rhode Island Office of Energy Resources**  
1 Capitol Hill, 4th Floor, Providence, RI 02908  
p. (401) 574-9119 | f. (401) 574-9125  
[Nicholas.Ucci@energy.ri.gov](mailto:Nicholas.Ucci@energy.ri.gov) | [www.energy.ri.gov](http://www.energy.ri.gov)

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**From:** [Ucci, Nicholas \(DOA\)](#)  
**To:** [Gray, Terry \(DFM\)](#); [Bianco, Todd \(PUC\)](#); [Rodvien, Emma \(PUC\)](#); [Gerwatowski, Ronald \(PUC\)](#); [George, Linda \(DPUC\)](#); [Bell, John \(DPUC\)](#)  
**Cc:** [Kearns, Christopher \(DOA\)](#); [Gill, Carrie \(DOA\)](#)  
**Subject:** Fw: [EXTERNAL] : Re: Comments  
**Date:** Thursday, October 1, 2020 7:12:27 AM  
**Attachments:** [20.9.30 100 by 2030 to OER.pdf](#)

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fyi.

I was not aware that Seth was emailing Brattle directly. I have requested that he send all comments and communication to OER directly, such that we can ensure proper consideration and circulation to the Project Team.

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**From:** Kearns, Christopher (DOA) <Christopher.Kearns@energy.ri.gov>  
**Sent:** Wednesday, September 30, 2020 12:54 PM  
**To:** Ucci, Nicholas (DOA) <Nicholas.Ucci@energy.ri.gov>; Beland, Shauna (DOA) <Shauna.Beland@energy.ri.gov>; Gill, Carrie (DOA) <Carrie.Gill@energy.ri.gov>; Yacoby, Yasmin (DOA - Contractor) <Yasmin.Yacoby.CTR@energy.ri.gov>; Olivieri, Jacklyn (DOA) <Jacklyn.Olivieri@energy.ri.gov>  
**Subject:** Fwd: [EXTERNAL] : Re: Comments

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**From:** Seth Handy <seth@handylawllc.com>  
**Sent:** Wednesday, September 30, 2020 12:42:05 PM  
**To:** Weiss, Jurgen <jurgen.weiss@brattle.com>  
**Cc:** Berkman, Mark <Mark.Berkman@brattle.com>; Murphy, Dean <Dean.Murphy@brattle.com>; Kearns, Christopher (DOA) <Christopher.Kearns@energy.ri.gov>  
**Subject:** [EXTERNAL] : Re: Comments

Good afternoon Jurgen:

On the 100% by 2030 stakeholder session yesterday, I tried to fill out the last questions about policy recommendations and concerns but got shut out of the system before I finished. So, I reviewed the memo I sent to the Governor shortly after she issued her order and to you at the outset of this process and updated it some with more (and/or more refined) thoughts.

Thanks for all your good work on this. Glad to discuss if that would be helpful.

Best.

Seth

Seth Handy | Handy Law LLC  
42 Weybosset Street

## Shaw, Jenny (DOA)

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**From:** George, Linda (DPUC)  
**Sent:** Thursday, November 12, 2020 1:27 PM  
**To:** Ucci, Nicholas (DOA)  
**Subject:** FW: [EXTERNAL] : FW: Synapse Community Solar RI Reports  
**Attachments:** 20.11.3 Synapse Rept CNM CBA.pdf

Nick,

FYI

**From:** Tim Woolf <[twoolf@synapse-energy.com](mailto:twoolf@synapse-energy.com)>  
**Sent:** Tuesday, November 10, 2020 1:31 PM  
**To:** George, Linda (DPUC) <[Linda.George@dpuc.ri.gov](mailto:Linda.George@dpuc.ri.gov)>; Bell, John (DPUC) <[John.Bell@dpuc.ri.gov](mailto:John.Bell@dpuc.ri.gov)>  
**Subject:** [EXTERNAL] : FW: Synapse Community Solar RI Reports

FYI. See below.

I will let you handle this. Let me know if you need anything from me.

I think it is an overstatement to say that the stakeholder comments will have no impact on the results. But that is a nuance.

Tim

**From:** Handy Seth <[seth@handylawllc.com](mailto:seth@handylawllc.com)>  
**Sent:** Tuesday, November 10, 2020 1:24 PM  
**To:** Tim Woolf <[twoolf@synapse-energy.com](mailto:twoolf@synapse-energy.com)>  
**Subject:** Fwd: Synapse Community Solar RI Reports

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External Email:

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Hi Tim:

Thanks again for all your work on this. So important to see the issues surfaced in docket 4600 applied through such analysis. The methodology and the results not just important to a (piddly) expansion of community net metering - they speak to and inform the future role of community net metering and net metering in RI's energy system. That's why they raise such concerns and warrant such attention and deliberation. I'm glad you're a part of that.

Just got off a call w OER & it doesn't look like stakeholders will be given an opportunity to dialogue directly with Soltage re the report. Nick said the report was developed by the Division (for the benefit of OER which doesn't have any funding) and while they intend to follow up w Synergy to discuss the comments it doesn't appear that any of the comments will have a material impact on the results it's unclear who is drawing that conclusion). I have deep concerns about that for reasons that presumably are evident to you.

Is there any way we could discuss this?

Thank you.



Seth

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TEL: 401 626.4839 | FAX: 401 753.6306  
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Begin forwarded message:

**From:** Handy Seth <[seth@handylawllc.com](mailto:seth@handylawllc.com)>  
**Subject:** Re: Synapse Community Solar RI Reports  
**Date:** November 5, 2020 at 3:34:12 PM EST  
**To:** Chris Kearns <[Christopher.Kearns@energy.ri.gov](mailto:Christopher.Kearns@energy.ri.gov)>  
**Cc:** "Beland, Shauna (DOA)" <[Shauna.Beland@energy.ri.gov](mailto:Shauna.Beland@energy.ri.gov)>, "Yacoby, Yasmin (DOA - Contractor)" <[Yasmin.Yacoby.CTR@energy.ri.gov](mailto:Yasmin.Yacoby.CTR@energy.ri.gov)>, "[priscilla@greenenergyconsumers.org](mailto:priscilla@greenenergyconsumers.org)" <[priscilla@greenenergyconsumers.org](mailto:priscilla@greenenergyconsumers.org)>, Leah Bamberger <[lbamberger@providenceri.gov](mailto:lbamberger@providenceri.gov)>, "[kcastro@groundworkri.org](mailto:kcastro@groundworkri.org)" <[kcastro@groundworkri.org](mailto:kcastro@groundworkri.org)>, "[camilovivieros@gmail.com](mailto:camilovivieros@gmail.com)" <[camilovivieros@gmail.com](mailto:camilovivieros@gmail.com)>, Mike Lucini <[mlucini@ismgroup.com](mailto:mlucini@ismgroup.com)>, Michelle Carpenter <[mcarpenter@tpoint-e.com](mailto:mcarpenter@tpoint-e.com)>, "[Angie.dimeo@arcadiapower.com](mailto:Angie.dimeo@arcadiapower.com)" <[Angie.dimeo@arcadiapower.com](mailto:Angie.dimeo@arcadiapower.com)>, "[krabbitt@nautilussolar.com](mailto:krabbitt@nautilussolar.com)" <[krabbitt@nautilussolar.com](mailto:krabbitt@nautilussolar.com)>, "Ucci, Nicholas (DOA)" <[Nicholas.Ucci@energy.ri.gov](mailto:Nicholas.Ucci@energy.ri.gov)>, Todd Bianco <[Todd.Bianco@puc.ri.gov](mailto:Todd.Bianco@puc.ri.gov)>, Linda George <[Linda.George@dpuc.ri.gov](mailto:Linda.George@dpuc.ri.gov)>, Jeremy McDiarmid <[jmcdiarmid@necec.org](mailto:jmcdiarmid@necec.org)>, Sean Burke <[sburke@necec.org](mailto:sburke@necec.org)>, Fred Unger <[unger@hrtwd.com](mailto:unger@hrtwd.com)>, "[camiloviveiros@gmail.com](mailto:camiloviveiros@gmail.com)" <[camiloviveiros@gmail.com](mailto:camiloviveiros@gmail.com)>, Amy Rainone <[arainone@rihousing.com](mailto:arainone@rihousing.com)>, Cynthia Wilson Frias <[Cynthia.WilsonFrias@puc.ri.gov](mailto:Cynthia.WilsonFrias@puc.ri.gov)>, Julian Dash <[jdash@cleaneconomydevelopment.com](mailto:jdash@cleaneconomydevelopment.com)>, Nishi Kumar <[nkumar@rihousing.com](mailto:nkumar@rihousing.com)>, "[pdubro@sunlightgeneral.com](mailto:pdubro@sunlightgeneral.com)" <[pdubro@sunlightgeneral.com](mailto:pdubro@sunlightgeneral.com)>, "[mjerzyk@gmail.com](mailto:mjerzyk@gmail.com)" <[mjerzyk@gmail.com](mailto:mjerzyk@gmail.com)>, Hank Webster <[HWebster@acadiacenter.org](mailto:HWebster@acadiacenter.org)>, "[nathan@votesolar.org](mailto:nathan@votesolar.org)" <[nathan@votesolar.org](mailto:nathan@votesolar.org)>, Jerry Elmer <[jelmer@clf.org](mailto:jelmer@clf.org)>, Brian Daniels <[bdaniels@rileague.org](mailto:bdaniels@rileague.org)>, "[jcrowley@clf.org](mailto:jcrowley@clf.org)" <[jcrowley@clf.org](mailto:jcrowley@clf.org)>, "[marc.hanks@directenergy.com](mailto:marc.hanks@directenergy.com)" <[marc.hanks@directenergy.com](mailto:marc.hanks@directenergy.com)>, Kai Salem <[kai@greenenergyconsumers.org](mailto:kai@greenenergyconsumers.org)>, Salar Naini <[snaini@tpoint-e.com](mailto:snaini@tpoint-e.com)>, Charlie Roberts <[Charlie@nautilussolar.com](mailto:Charlie@nautilussolar.com)>, "[richard.caperton@arcadiapower.com](mailto:richard.caperton@arcadiapower.com)" <[richard.caperton@arcadiapower.com](mailto:richard.caperton@arcadiapower.com)>, "Rodvien, Emma (PUC)" <[Emma.Rodvien@puc.ri.gov](mailto:Emma.Rodvien@puc.ri.gov)>, Bob Simmons <[bsimmons@HallKeen.com](mailto:bsimmons@HallKeen.com)>, "Verdi, Nicole (GOV)" <[Nicole.Verdi@governor.ri.gov](mailto:Nicole.Verdi@governor.ri.gov)>, "Michael B. 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## Shaw, Jenny (DOA)

---

**From:** Handy Seth <seth@handylawllc.com>  
**Sent:** Thursday, November 12, 2020 3:59 PM  
**To:** George, Linda (DPUC)  
**Cc:** Ucci, Nicholas (DOA); Kearns, Christopher (DOA)  
**Subject:** Re: [EXTERNAL] : FW: Synapse Community Solar RI Reports

Hi Linda:

OK, got that message.

Thanks.

Best.

Seth

Seth Handy | Handy Law LLC  
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On Nov 12, 2020, at 3:43 PM, George, Linda (DPUC) <[Linda.George@dpuc.ri.gov](mailto:Linda.George@dpuc.ri.gov)> wrote:

Seth,

Tim Woolf forwarded your email to the Division for response. In anticipation of an OER filing with the PUC pursuant to 39-26.4-3(a)(1)(i), the Division hired Mr. Woolf with Synapse Energy to conduct a benefit cost analysis and provide expert testimony before the PUC. As a general rule, the Division does not make its expert witnesses available to stakeholders. As a courtesy however, the Division provided stakeholders an opportunity to review and comment on Mr. Woolf's report prior to OER's filing with the PUC. Mr. Woolf incorporated some of the comments into the report. As you may know, you can file comments with the PUC once the matter is docketed.

Regards,  
Linda

**From:** Handy Seth <[seth@handylawllc.com](mailto:seth@handylawllc.com)>  
**Sent:** Thursday, November 12, 2020 3:16 PM  
**To:** Ucci, Nicholas (DOA) <[Nicholas.Ucci@energy.ri.gov](mailto:Nicholas.Ucci@energy.ri.gov)>  
**Cc:** George, Linda (DPUC) <[Linda.George@dpuc.ri.gov](mailto:Linda.George@dpuc.ri.gov)>; Kearns, Christopher (DOA) <[Christopher.Kearns@energy.ri.gov](mailto:Christopher.Kearns@energy.ri.gov)>  
**Subject:** Re: [EXTERNAL] : FW: Synapse Community Solar RI Reports

Nick:

I thought (and still think) it most efficient and productive to approach and speak with Tim directly, since he produced the report. The State isn't giving us that opportunity. Putting a State filter on such stakeholder dialogue isn't necessary or appropriate. We are customers paying for and ultimately impacted by this consultant's service.

No need for the expense and aggravation of going through all of these issues with the PUC where there's an opportunity to address in advance through adequate dialogue. I trust that Tim would appreciate an opportunity to address stakeholder feedback directly to the stakeholders, knowing him. I'm not aware of stakeholder processes that have sought to avoid such direct and open dialogue before.

As you can see below, I didn't state that our comments would have little impact, I said you had said that, which I still submit to be what I heard on the call.

But, here we are. I gather customers will need another means to bring expertise to bear on this report, since we're not allowed direct access to the consultant, hired by the ratepayer advocate. We'll do our best to bring that forward with whatever resources we can spare/gather.

Respectfully.

Seth

Seth Handy | Handy Law LLC  
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[www.handylawllc.com](http://www.handylawllc.com) [[handylawllc.com](http://handylawllc.com)]

On Nov 12, 2020, at 2:42 PM, Ucci, Nicholas (DOA) <[Nicholas.Ucci@energy.ri.gov](mailto:Nicholas.Ucci@energy.ri.gov)> wrote:

Seth,

Tim Woolf kindly shared with me the email you sent below.

As I requested in another engagement (100% by 2030), I would appreciate it if any comments you have relative to OER initiatives be sent to the state agency(ies) leading the work - not our consultants. It is an inefficient way for stakeholders to have their voice heard and, inappropriately, places third-party consultants in an unfair position to have to divine how/when to respond. It can also be costly to public entities, as consultants bill their time accordingly. These consultants serve as our clients and execute their tasks at our direction. I would appreciate it if any future comments on OER-related study efforts, such as this one, be sent directly to myself and/or my staff.

Second, your comments could be read as mischaracterizing what was conveyed to stakeholders on Tuesday. From the beginning of this initiative, Synapse - at the direction of the DPUC and with support from OER - requested and gathered developer/industry-specific data as one of many data sets utilized to construct and inform their analysis. We then shared a draft of that analysis with all engaged stakeholders, who were then solicited for additional observations and comments. These comments, including those you submitted, were shared with OER, DPUC and Synapse staff for our collective consideration and discussion. It is not accurate to claim these comments have had no impact, as the finalized version of the analysis has not yet been distributed. Moreover, we subsequently held Tuesday's meeting for additional discussion and observations by

stakeholders. During that meeting, you spent time conveying your thoughts, which were noted by me and others on the call.

Finally, OER always strives to reach consensus viewpoints whenever we can. However, we also recognize that full alignment on analyses and policy positions cannot always be achieved. To the extent a petition is filed with (and docketed by) the Public Utilities Commission, interested parties would have the ability to intervene directly and/or submit public comment, as is general practice, to support or take issue with anything the state agencies (or any other party) may submit. Stakeholders would also be welcome to produce distinct analyses of their own.

My team and I, along with our good colleagues at the DPUC, have worked very hard to inform a voluntary course of action on CRNM expansion - one that OER believes can be successful. Thank you for your engagement and consideration.

Regards,  
Nick

---

**From:** Handy Seth <[seth@handylawllc.com](mailto:seth@handylawllc.com)>  
**Sent:** Tuesday, November 10, 2020 1:24 PM  
**To:** Tim Woolf <[twoolf@synapse-energy.com](mailto:twoolf@synapse-energy.com)>  
**Subject:** Fwd: Synapse Community Solar RI Reports

External Email:

Hi Tim:

Thanks again for all your work on this. So important to see the issues surfaced in docket 4600 applied through such analysis. The methodology and the results not just important to a (piddly) expansion of community net metering - they speak to and inform the future role of community net metering and net metering in RI's energy system. That's why they raise such concerns and warrant such attention and deliberation. I'm glad you're a part of that.

Just got off a call w OER & it doesn't look like stakeholders will be given an opportunity to dialogue directly with Soltage re the report. Nick said the report was developed by the Division (for the benefit of OER which doesn't have any funding) and while they intend to follow up w Synergy to discuss the comments it doesn't appear that any of the comments will have a material impact on the results it's unclear who is drawing that conclusion). I have deep concerns about that for reasons that presumably are evident to you.

Is there any way we could discuss this?

Thank you.

Seth

Seth Handy | Handy Law LLC  
42 Weybosset Street  
Providence RI 02903

**Exhibit B**  
Evidence that OER Set Policy Direction

**From:** [Murphy, Dean](#)  
**To:** [Gill, Carrie \(DOA\)](#); [Ucci, Nicholas \(DOA\)](#)  
**Cc:** [Hagerty, Michael](#)  
**Subject:** [EXTERNAL] : RI 100 - Recommendations sections  
**Date:** Friday, December 18, 2020 6:05:04 PM

---

Carrie, Nick –

We wanted to check in on how it is coming with the recommendations sections. If you have them, or even a rough draft, we'd like to show them to our design team so they can start to think about layout for those sections, and the shape of the overall document. We would also like to get the Stakeholder section; I can't remember who was going to pull that together (maybe Yasmin but I'm not sure).

Thanks,  
Dean

**DEAN MURPHY**

Principal

**The Brattle Group**

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[dean.murphy@brattle.com](mailto:dean.murphy@brattle.com)

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\*\*\*\*\*

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\*\*\*\*\*

**From:** [Murphy, Dean](#)  
**To:** [Ucci, Nicholas \(DOA\)](#); [Hagerty, Michael](#)  
**Cc:** [Gill, Carrie \(DOA\)](#)  
**Subject:** [EXTERNAL] : RE: Today's meeting  
**Date:** Friday, November 6, 2020 9:07:48 AM

---

That will work fine, Nick. I was wondering whether we would be able to get through all the analytics and still have time for a meaningful policy discussion anyway, so this will allow us to take our time a bit on the former.

Look forward to your feedback on the policy side when you have it, and your guidance on how much/which of the policy material to present at the Workshop (in just 2 weeks).

Dean

**From:** Ucci, Nicholas (DOA) <Nicholas.Ucci@energy.ri.gov>  
**Sent:** Friday, November 6, 2020 9:03 AM  
**To:** Murphy, Dean <Dean.Murphy@brattle.com>; Hagerty, Michael <Michael.Hagerty@brattle.com>  
**Cc:** Gill, Carrie (DOA) <Carrie.Gill@energy.ri.gov>  
**Subject:** Today's meeting

Hi Dean, Mike -

For today, I would like to skip over the policy discussion to give the State team a bit more time for internal conversation. The material you have provided is great; we just need some time to work through it on our own a bit more and have discussion with others.

Let's focus on analytics today, reviewing the other slides you have provided and perhaps other issues which may be outstanding from your end (even if we do not have slides). Apologies for the late change in agenda, but I appreciate your flexibility.

Talk soon.

Regards,  
Nick

---

**Nicholas S. Ucci**  
**Commissioner**  
**Rhode Island Office of Energy Resources**  
1 Capitol Hill, 4th Floor, Providence, RI 02908  
p. (401) 574-9119 | f. (401) 574-9125  
[Nicholas.Ucci@energy.ri.gov](mailto:Nicholas.Ucci@energy.ri.gov) | [www.energy.ri.gov](http://www.energy.ri.gov)

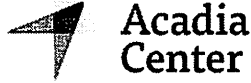
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**Exhibit C**  
Stakeholder Comment on Accounting for  
Benefits of Local Energy





August 6, 2020

Dear Commissioner Ucci,

Thank you for the opportunity to comment on “The Road to 100% Renewable Electricity 2030” presented at the public workshop by OER and the team of consultants on July 9, 2020. The undersigned organizations have three primary overarching comments:

1. The science of climate change is clear and unequivocal. To prevent the worst effects of climate change and also make the clean energy transition at lowest cost to Rhode Islanders, the state must act quickly and decisively to *fully* decarbonize our economy by 2050. The presentation discussed the Resilient Rhode Island Act goal of 80% by 2050 – but we recommend OER and other state agencies instead adopt a more appropriate target, based on science that acknowledges electric sector decarbonization needs to be part of a larger effort to completely eliminate carbon emissions by 2050.
2. The Road to 2030 could be an exciting initiative – if this study is accompanied by a **detailed plan of immediate action** from your office. Making a commitment to decarbonization is not the same as doing the work and passing the necessary policies to make it happen. We were disappointed that the Heating Sector Transformation report, despite significant investment of state money and stakeholder time, did not result in concrete policy recommendations and concluded that further study would be needed. Luckily, many of the policies that will move us forward on 100% renewable electricity are well established, both here and across the country. We have already implemented some, like the Renewable Energy Standard. We hope that more strategies will arise from this study. Actions that we believe need to be taken immediately include:
  - a. Work with the General Assembly to pass a 100% by 2030 Renewable Energy Standard. Senate Bill 2404 (2020), sponsored by Senator Josh Miller and cosponsored by Environment Committee Chair Sosnowski and Finance Committee Chair Conley, would have achieved this goal.
  - b. File legislation directing National Grid to procure considerably more offshore wind. In order to reach 100%, Rhode Island will need more large-scale offshore wind projects online by 2030, which means the procurement process must begin immediately. Large scale procurements and RES increases must occur simultaneously; past procurements by National Grid have caused sell-offs of Renewable Energy Certificates that do not create additionality. Until additional offshore wind comes online, New England has sufficient renewable resources in the short-term to meet an enhanced Renewable Energy Standard.
  - c. Strengthen efficiency policy and programs. The legislature must extend and strengthen Least Cost Procurement; it must also pass and implement other tried and true energy efficiency policies, such as appliance efficiency standards and stronger building codes, including building performance standards.
  - d. Work with the General Assembly, the DG Board, town planners, and others on policy that would guide responsible renewable energy development while protecting open space and vulnerable areas.

- e. Extend and expand the Renewable Energy Growth program, which provides for in-state renewable energy development overseen by a stakeholder board and allows for pricing mechanisms to align energy development with policy goals.
3. Although achieving 100% renewable electricity by 2030 through REC-based accounting should be the priority of this study, we urge the consultants and OER to consider alignment between this study and important, ongoing efforts to phase out Rhode Island’s fossil fuel power generation. Fossil fuel generation impacts the public health, property values, and environmental safety of many Rhode Islanders, especially those most vulnerable across economic indicators. The intent of this study will not be truly completed until Rhode Island has phased out all fossil fuel generation.

We appreciate the framework of Guiding Principles being used by the Brattle Group to direct this study. We have a few comments on the proposed Principles:

- The consultants mentioned at the onset that there would likely be “conflicts” among the principles: places where the principles do not agree. We strongly recommend that OER, DEM, and DPUC are clear that the guiding principle for this work is the full decarbonization of the Rhode Island electric sector. We further encourage any framing to center around the alignment of these goals rather than tradeoffs. Decarbonization—and the resulting long-term reliability and affordability of the electric grid of the future—is the ultimate goal of this study. The other principles are in service of how to best achieve that goal.
- Decarbonization:
  - We support the inclusion of this section, but are surprised that the three subcomponents do not mention meeting science-based greenhouse gas emissions targets. Leadership, Broader Decarbonization, and the Power Sector Decarbonization efforts are all important components of this – but the overarching principle is getting Rhode Island in line with where the science tells us we need to be.
  - On Power Sector Decarbonization, we strongly support the emphasis on additionality. We believe that grid decarbonization in Rhode Island must and will occur in tandem with decarbonization efforts in other New England states, and thus we are comfortable with the 100% renewable electricity goal being met with RECs from across New England. Including renewable energy from across New England in this goal will lower costs to ratepayers and decrease the burden on Rhode Island’s limited capacity for renewable energy siting.
- Economic Principles:
  - We agree that clean energy is an area of economic opportunity and job growth for Rhode Island. In the last 5-10 years, we have seen how clean energy policies and programs have created thousands of Rhode Island jobs and become one of the fastest growing economic sectors in the state.
  - We champion the inclusion of support for energy equity for all Rhode Islanders – particularly Rhode Islander communities with systematic underinvestment, such as frontline communities of color. However, we question whether this focus belongs only under “Economic Principles” as it is a more overarching and fully encompassing principle.
  - Under the first bullet of “Cost Effective”, there is a strong focus on considering “all costs” and “lowest reasonable costs”. We would like all considerations of cost to also consider benefits, such as job growth, public health benefits, and more money circulating within the state and region instead of being spent on imported fossil fuels. Considering costs while ignoring benefits can severely undervalue good programs.

- Policy Implementation:
  - We firmly agree with supporting policies that are “Robust and Sustainable Beyond 2030.” To this end, we are concerned that storage and grid modernization were explicitly not included. While the need for storage through 2030 might be limited, policies and programs that will ensure 100% renewables past 2030 will certainly require storage, and the state must have a plan in place to develop storage as it becomes increasingly important from 2030 to 2050. Further, storage does have immediate short term benefits in delaying costly electric infrastructure upgrades, improving resiliency and reliability, and providing consumer benefits—particularly when paired with demand response programs and anticipated time of use rates that should ideally occur well before 2030. At a minimum, this study should consider and coordinate with National Grid’s ongoing grid modernization planning.
  - While we agree that consistency with existing policy is a good goal, we also recognize that the existing policy landscape has room for improvement – and often leaves us with development that is not “Consistent with Other Rhode Island Policy (bullet #9).” In addition to the REG program expansion recommended above, we recommend that siting concerns are addressed alongside any expansions to virtual net metering (such as increasing off-takers or expanding limits).

Lastly, in response to a comment during the presentation, Brattle explained that they model avoided costs with a \$75/ton price on carbon, which they said was consistent with the state’s energy efficiency programs. From National Grid’s last energy efficiency filing, they assumed a similar price per ton of carbon (\$68/ton, but considered up to \$100/ton) for the societal costs on carbon. We support these numbers and also advocate that they be used in OER’s study on carbon pricing. We are concerned that all of the prices being considered in the OER carbon pricing study are lower than this reasonable, expert-determined value.

The climate crisis is one that we have seen coming for many years. Governor Raimondo’s administration demonstrated a desire to be a climate leader by committing to this process; however, leadership consists of follow through and policy implementation. Even a small state like Rhode Island can lead the way, as we did with efficiency. Now we call upon Rhode Island’s legislature and administration to lead by developing and implementing, with both executive and legislative action, a truly inclusive, ambitious, and forward-looking plan to get us to 100% Renewable Electricity. We stand ready to work alongside you and this administration to deliver a cleaner, healthier future for all Rhode Islanders.

Thank you,

Hank Webster, Acadia Center

Meg Kerr, Audubon Society

Kai Salem, Green Energy Consumers Alliance

Sue AnderBois, The Nature Conservancy

CC:

Janet Coit, Department of Environmental Management

Linda George, Division of Public Utilities and Carriers

**Via Electronic Mail**

November 6, 2020

Nicholas Ucci, Commissioner  
Rhode Island Office of Energy Resources  
One Capitol Hill  
Providence, RI 02908

**Re: NECEC Initial Comments on the 100% Renewable Electricity Initiative**

Dear Commissioner Ucci,

The Northeast Clean Energy Council (“NECEC”) appreciates the opportunity to provide initial comments on Rhode Island’s 100% Renewable Electricity Initiative (the “100% Strategy”) to the Office of Energy Resources (“OER”). NECEC commends Governor Raimondo for establishing a goal of achieving 100% renewable electricity by 2030 and reiterates that it is an Initiative that NECEC strongly supports. As OER evaluates and makes recommendations about the pathways to satisfy the ambitious goals of the Executive Order, NECEC believes Rhode Island will be best served by executing a 100% Strategy that is flexible, diversified, and designed for long-term success. In short, the 100% Strategy must ensure a just and swift transition to a clean energy economy that captures the benefits of investing in clean energy.

NECEC is a clean energy business, policy, and innovation organization whose mission is to create a world-class clean energy hub in the Northeast, delivering global impact with economic, energy and environmental solutions. NECEC is the only organization in the Northeast that covers all of the clean energy market segments, representing the business perspectives of investors and clean energy companies across every stage of development. NECEC members span the broad spectrum of the clean energy industry, including clean transportation, energy efficiency, wind, solar, energy storage, microgrids, fuel cells, and advanced and “smart” technologies.

Equitably transitioning the electric sector to no-carbon, renewable energy sources is an effective and necessary goal for the next decade. As presented at the Second Public Workshop on September 29<sup>th</sup>, the Brattle Group’s analysis of electricity demand projections shows significant increases in the amount of renewable energy on the grid by 2030.<sup>1</sup> However, 2030 cannot be the end goal; rather, Rhode Island must achieve and then maintain 100% renewable electricity beyond 2030, even as electricity demand increases as other sectors of the economy become increasingly electrified. Despite some degree of cost and load uncertainty, the Brattle Group’s projections through to 2050 account for the substantial electrification of the heating and transportation sectors.<sup>2</sup> These forecasts also demonstrate some of the challenges to the system that may arise, including transmission and distribution upgrades, interconnection costs, and inadequate storage capacity. As such, NECEC encourages OER to prioritize in-state renewable development, future storage needs, and adaptability in its policy pathways.

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<sup>1</sup> Brattle Group Draft Findings - Public Workshop #2

<sup>2</sup> Brattle Group Draft Findings - Public Workshop #2

## Equity Must Be at the Core of the 100% Strategy

OER has an opportunity to explicitly and intentionally ground its 100% Strategy in equitable solutions that increase clean energy access to underrepresented communities and deliver local pollutant reductions as co-benefits to overburdened communities. To do so, OER should continue to engage local community leaders to develop plans that achieve these goals throughout the process and set specific targets and resource allocations that directly benefit underrepresented communities.

## The 100% Strategy Should Encourage In-State Resource Development

Meeting—and sustaining—the Governor’s ambitious 2030 goal will require contributions from both in-state and out-of-state renewable resources. In certain instances, this may create a tension between cost and economic development opportunity. NECEC believes that the Renewable Energy Standard (“RES”) will be a key policy tool in the 100% Strategy. In isolation, however, a 100% RES will not guarantee in-state local, pollutant reductions and will not deliver the significant local economic benefits from clean energy deployment. Thus, OER’s 100% Strategy should include both an increase in the annual RES targets to 100% by (or before) 2030 and commitments to complementary policies that drive in-state development of renewable generation and demand side resources, including the Renewable Energy Growth program, offshore wind and other renewable procurements, aggressive energy efficiency mandates, and explicit energy storage targets.

Governor Raimondo’s recent announcement<sup>3</sup> that the state will be issuing an RFP for up to 600 megawatts of offshore wind capacity demonstrates this commitment to development that will deliver energy and RECs to the state. Coupled with increased offshore wind deployment, local distributed renewable energy deployment will improve power reliability, create jobs and other economic activity, decrease risks of insufficient transmission capacity and renewable deployment across New England states, and ensure that residents of the state directly receive the benefits from reduced carbon emissions.

Driving in-state deployment will give Rhode Island greater control over its clean energy destiny and will be especially crucial in delivering local benefits to Environmental Justice populations that all too often bear a greater burden from local pollution and lack access to the economic benefits of clean energy. We encourage OER to include policies that incentivize Rhode Island-based clean energy deployment in its pathway to 100% Renewable Electricity.

## Incorporate Energy Storage

According to the Brattle Group’s assessment, the need for storage capacity will become increasingly important from 2030 onward as more intermittent renewables are incorporated into the grid.<sup>4</sup> It would be a missed opportunity to wait until 2030 to promote significant storage deployment. Storage must become a primary component of the state’s energy portfolio now. As more New England states turn toward intermittent renewable resources, storage capacity has the ability to facilitate greater renewable deployment, mitigate interconnection and consumer

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<sup>3</sup> <https://www.ri.gov/press/view/39674>

<sup>4</sup> Brattle Group Draft Findings - Public Workshop #2

costs, avoid disruptions, and increase grid flexibility and efficiency. In order to meet and maintain the 2030 goal preparedly and cost effectively, OER should establish aggressive storage targets as part of the 100% Strategy.

#### OER Should Build Flexibility into the 100% Strategy

As grid conditions change, clean energy costs continue to decline, and technology advances, OER's policy pathway should be adaptable to changing conditions. Because technologies or strategies will evolve, the 100% Strategy must be designed to respond to changing conditions. This can take the form of periodic program reviews, flexible participation criteria, and forums for stakeholder involvement. Rhode Island will be well suited by having policy frameworks in place that are able to adapt to future uncertainties.

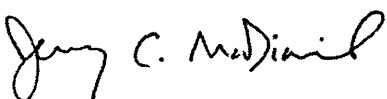
#### OER Must Account for On-the-Ground Challenges

In Rhode Island and across the Northeast, NECEC sees increasingly significant deployment challenges for renewable energy resources. Perhaps most acute, interconnection and siting issues have become substantial, often impassable, barriers to renewable energy development. Development timeframes can extend to multiple years and interconnection costs can exceed \$1 million per megawatt. Siting decisions are often complex and acrimonious. The 100% Strategy must account for these issues to reach the 100% renewable electricity target. NECEC encourages OER to make resolving interconnection and siting challenges an explicit goal of the 100% Strategy so that all stakeholders can have a hand in delivering creative solutions that will accelerate development timeframes, decrease costs and provide improved planning strategies.

#### Conclusion

Thank you for the opportunity to provide comment on the Public Policy Development Process for the 100% Renewable Electricity Initiative. NECEC encourages OER to adopt a policy framework that encourages in-state renewable development, considers the importance of and need for increased storage capacity, and delivers an adaptable policy framework that recognizes cost and market uncertainty. Please contact us if you have any questions.

Sincerely,



Jeremy McDiarmid  
Vice President, Policy & Government Affairs



Sean Burke  
Policy Associate

cc: Nicole Verdi, Governor's Office  
Christopher Kearns, OER



## Executive Order 20-1: 100% Renewable Energy by 2030

### Comments on Public Workshop #2

Sunrun commends Governor Raimondo for issuing Executive Order 20-1 setting a state goal of 100% renewable energy by 2030. We also thank the Office of Energy Resources for allowing the opportunity to provide comments during this stakeholder process. These comments will address the demand forecasts, the role of behind-the-meter (“BTM”) solar in meeting the state’s goal, and net metering policy.

Sunrun Inc. (Nasdaq: RUN) is the nation’s leading home solar, battery storage, and energy services company. Founded in 2007, Sunrun pioneered home solar service plans to make local clean energy more accessible to everyone for little to no upfront cost. Sunrun’s innovative home battery solution, Brightbox, brings families affordable, resilient, and reliable energy. The company can also manage and share stored solar energy from the batteries to provide benefits to households, utilities, and the electric grid while reducing our reliance on polluting energy sources. For more information, please visit [www.sunrun.com](http://www.sunrun.com).

#### *Demand Forecast*

The four load forecasts of 2030 electric demand provided in Public Workshop #2 are instructive in thinking about the dynamics of BTM solar, energy efficiency, and electrification and how they impact the 2030 goal and associated generation needs. We believe that the High Demand forecast should be used for planning purposes. While the High Demand forecast only includes limited electrification of vehicles and heating, as demonstrated on page 23 of the workshop presentation, decarbonization efforts will not stop in 2030. Electric demand could double by 2050, thus if actual demand in 2030 is lower than the High Demand forecast it will still put Rhode Island in a better position to absorb additional electrification post-2030 while maintaining a 100% renewable energy electric grid. Given the additional progress needed beyond 2030 it would make sense to err on the side of a higher demand forecast.

#### *Role of Behind-the-Meter Solar and Storage*

Behind-the-meter solar and energy storage should be a critical resource for Rhode Island in achieving the goal of Executive Order 20-1. Without focusing on deployment of rooftop solar first, thousands of acres of land may be unnecessarily cleared and millions of dollars in transmission and distribution upgrades may be unwisely spent. Additionally, rooftop solar and batteries can help provide energy for electric vehicles, heat pumps, induction stoves, and all of the other electric devices needed to achieve long term decarbonization goals. Behind-the-meter batteries are paired with rooftop solar 95% of the time, according to recent data from WoodMac GTM.<sup>1</sup> BTM solar and batteries are the cornerstone to

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<sup>1</sup> See Wood Mackenzie Power & Renewables / U.S. Energy Storage Association, *U.S. Energy Storage Monitor Q3 2020* at p. 70 (Sept. 2020) available at



ensuring that EVs, heat pumps, etc., can all work in concert as a grid resource, making the grid cleaner, less expensive, and much more resilient.

Beyond the electric grid benefits of BTM solar and storage, it also provides a significant positive economic impact on local economies. Considering the amount of solar that needs to be deployed in the next 10 years, and then maintaining or increasing that pace post-2030 to meet decarbonization goals, there is a clear economic opportunity that should be taken advantage of. The solar industry already supports over 1,000 jobs in Rhode Island, with behind-the-meter solar supporting many of those.<sup>2</sup>

Rhode Island will need a mix of clean energy technologies to achieve 100% renewable energy by 2030. While large scale resources such as offshore wind and utility scale solar may be able to provide a significant amount of the necessary capacity, there is a clear role for BTM resources as well. BTM resources provide resiliency benefits that cannot be provided by any front-of-the meter resource. The back-up power provided by solar and storage systems across the northeast during the recent Tropical Storm Isaias is a timely reminder of these resiliency benefits and the very real impact it has on people's lives. As storage becomes increasingly common in Rhode Island, the state should prioritize ensuring access to low-income and traditionally underserved communities whose energy burden is typically the highest.

The 850 MW of technical capacity for small and medium scale solar resources provided by Synapse is a useful benchmark to inform what percentage of Rhode's Island mix should come from BTM resources. Targeting an additional 250-300 MW of residential and small commercial solar by 2030 could be an appropriate goal based on the Brattle analysis. Achieving that target would require approximately doubling the 2020 CELT forecast for Rhode Island BTM solar.<sup>3</sup> There would need to be changes made to the state solar programs to facilitate that level of growth and deployment.

#### *Policy Considerations & Recommendations*

The second workshop raised the key issue of what role should net metering play in meeting the 100% renewable energy standard. Net metering has been a foundational policy across the United States and has helped lead to the deployment of millions of rooftop solar systems. Especially in states where solar penetration is low, like Rhode Island, net metering provides an elegant, customer-friendly billing structure. The net metering structure is also extremely flexible in its ability to be coupled with other incentives, energy efficiency efforts, and advanced rate designs such as time-of-use or demand

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<https://www.woodmac.com/research/products/power-and-renewables/us-energy-storage-monitor/>.

<sup>2</sup> *Based on The Solar Foundation's 2019 Solar Jobs Census report available at <http://www.solarstates.org/#state/rhode-island/counties/solar-jobs/2019>.*

<sup>3</sup> *See ISO NE, CELT Reports, 2020 CELT Report, 2020-2029 Forecast Report of Capacity, Energy, Loads and Transmission at Tab 3.1: PV Forecast - Nameplate (Apr. 30, 2020) available at <https://www.iso-ne.com/system-planning/system-plans-studies/celt/> ("2020 CELT Report").*





response. This flexibility allows incremental changes to be made as solar penetration increases to address state-specific policy objectives.

Brattle correctly identifies the issue in Rhode Island that NEM systems are not currently obligated to provide RECs to in-state load serving entities, and that unless the net load used for RES determinations is grossed up to account for behind-the-meter generation, there is the risk of double counting. We would like to stress that this is largely an accounting issue and not a fundamental issue with BTM solar or net metering as a structure.

Sunrun supports making changes to the state's behind-the-meter solar programs to address this issue and to increase deployment to the levels necessary to reach 100% renewable energy by 2030. Two of the three primary policies for encouraging residential solar in Rhode Island have constraining elements that make them difficult to utilize and limits market growth. The Renewable Energy Growth program's feed-in tariff model is incompatible with energy storage, which is becoming more popular as costs decline and customers look for clean options to provide back-up power in the northeast, and has an annual cap on the program. The Renewable Energy Fund has extremely limited funding, is only available for direct ownership projects, and its solicitation structure is problematic to typical residential project development cycles. The policy that is not constrained, net metering, should be the primary vehicle for spurring additional small scale solar in the coming decade.

This action plan is a good opportunity to incorporate the transfer of RECs for net metered systems to in-state load serving entities and to take a holistic view of the existing programs to ensure that they will enable, and not constrain, achieving a 100% renewable energy grid. There are a number of workable solutions to handle the transfer of and payment for RECs so we will not endorse a specific structure in these comments, but should the Office of Energy Resources be interested in addressing this issue we would welcome a chance to participate in that process.

We appreciate the opportunity to provide these comments and look forward to the forthcoming action plan.

Kyle Wallace  
Sr. Manager, Public Policy  
kyle.wallace@sunrun.com

**From:** [Roberts, J. Timmons](#)  
**To:** [Ucci, Nicholas \(DOA\)](#); [Coit, Janet \(DEM\)](#)  
**Subject:** [EXTERNAL] : Our decarbonization study coming out in ERSS, and one thought  
**Date:** Wednesday, December 23, 2020 10:32:12 AM  
**Attachments:** [Proofs Roberts Et al 2020 ERSS Faster and Steeper is Feasible.pdf](#)

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Dear Nick and Janet,

First of all, it means so much to me how approachable and open you both have been to my unrelenting interventions at meetings, and I appreciate the respect and kindness you've shown me. As I said at one of them this last week, this is what is so wonderful and special about Rhode Island. Thank you.

And congratulations on the launch of the TCI-P, and best with it going forward. I'll loo into it more and be judicious in my public expressions! I do wish it was more ambitious, but I think the focus on revenue generation for transit and justice is a very good approach, given the level of the fee.

Working with Jason Veysey of Stockholm Environment Institute, we revised our 2019 GHG deeper decarbonization study into a scholarly article. It got lots of great feedback, and I think it's gotten stronger. Early page proofs are attached--clearly the big table on the assumptions in the behavioral change scenario will need to be cleaned up by the layout people, but you'll get an idea of what will be in it. So this is both a bit of a heads up, and another thanks, since we met with you, Nick, back at the beginning of this process. And Janet you were open to having the results presented at the EC4 whenever that was, a little over a year ago. I think what resulted was an exciting and interesting study. I'm pleased to see it getting referred to in consultant reports and agency efforts, but I think this scholarly paper raises some other and really important issues for the state's decarbonization efforts going forward.

My third point is a comment about the scale of of the efforts ahead of us and the need for innovative finance to make them happen. To get to 100% renewables by 2030 and to near carbon neutrality by 2040 or 2050, we're going to need beneficial electrification of everything possible, and deep energy efficiency retrofits of all public schools and municipal and state buildings, let alone all commercial and housing units. You two know all that. But to incentivize and/or directly pay for them, we'll need major investment, incentives, rebates and direct subsidies.

A key step would be developing ways for the later energy savings from renewables to pay for the investment now. So my questions to you, Nick, in the two meetings this week, rather clumsily suggested more direct governmental roles in that--planning for how to spend a possible Biden-era green stimulus, but also taking out major state bonds to put in rotating loan funds, perhaps managed by the Infrastructure Bank. With interest rates at historic lows (essentially negative, with expected inflation), and with the scale of investment we need to see happen to make this transition, this kind of borrowing makes sense.

Another perhaps more radical sounding idea was the state taking up joint partnerships in major offshore wind facilities, where a private developer brings the technical and managerial experience and the state invests (potentially from pensions or other reserves) and shares profits. If these are indeed regulated utilities and have long-term Power Purchase Agreements, they are excellent and very secure investments. The state pension funds are currently invested in more volatile stock and hedge funds, etc.; this could be a stable return investment. This is

another way to build our state economy rather than sending all our investments out of state. At the least, it should be looked into seriously. There are plenty of examples in this and other sectors, such as the TVA or municipal utilities, or highways, airports, sports arenas and stadiums. I'll send along some more ideas as I find better materials, but I wanted to just raise this approach as something that should be included in future studies and discussions.

Our lobbying research funded by the Barr Foundation shows most utilities are obstructionist in Southern New England legislatures. If our major utility is sometimes inattentive, inflexible and/or not moving us forward on the rapid energy transition we need, then we should be considering other firms, or even municipalization. I know that sounds radical, but even serious consideration of it might inspire greater action by National Grid. On the role of utilities in blocking rapid climate action at the state level in the U.S., I encourage you both to read Leah Stokes' amazing book *Short Circuiting Policy*. In fact, if I had your home address I'd send you each a copy for Christmas! Can I do that? If so, send me your addresses.

I wanted just to raise this issue for the need for broader thinking on investments and pathways to drive the truly ambitious action that we need. The studies that are going on are really great, but we need to get beyond the technical studies to focus our attention to the financing and politics of making them happen.

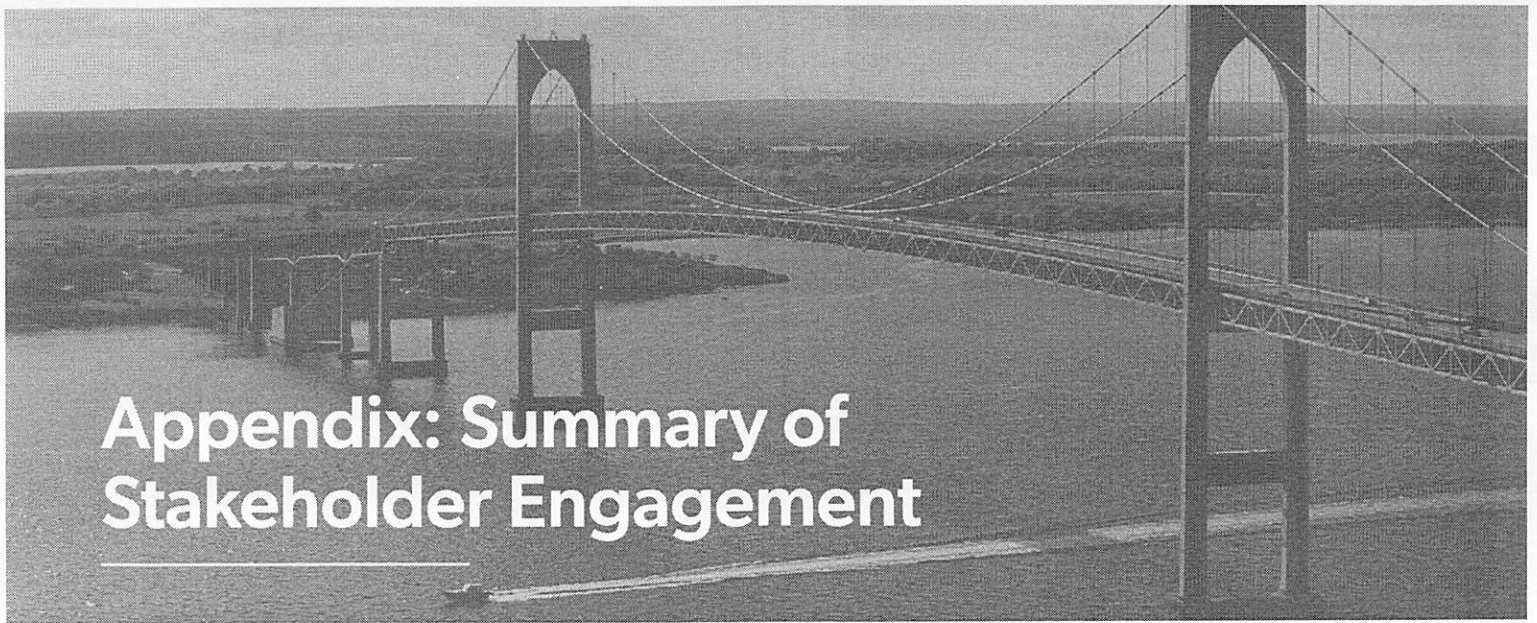
I wish you both a restful holiday after a brutally tough year. And again, thanks for being so receptive.

Timmons

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J. Timmons Roberts; On sabbatical, 2020-'21 academic year  
Ittleson Professor of Environmental Studies and Sociology, [Brown University](https://www.brown.edu)  
[\[vivo.brown.edu\]](https://vivo.brown.edu)  
Director, the [Climate and Development Lab](https://climatedevlab.brown.edu) [\[climatedevlab.brown.edu\]](https://climatedevlab.brown.edu)  
[Institute at Brown for Environment and Society](https://brown.edu) [\[brown.edu\]](https://brown.edu)  
[Brown Department of Sociology](https://brown.edu) [\[brown.edu\]](https://brown.edu)  
Executive Director, [Climate Social Science Network](https://cssn.org) [\[cssn.org\]](https://cssn.org)  
Visiting Research Fellow, [Stockholm Environment Institute](https://sei.org) [\[sei.org\]](https://sei.org)  
On Twitter [@timmonsroberts](https://twitter.com/timmonsroberts) [\[twitter.com\]](https://twitter.com/timmonsroberts)

Question Report: 100% Renewable Electricity Public Workshop #3		
#	Question	
1	How do you anticipate the new presidential administration will affect renewables development? Do you expect increased federal incentives that will add to development pressure and/or timelines for development?	
2	Does Rhode Island have good potential for geothermal energy? Not just for heating but electricity?	
3	Analyzing Renewable Costs and Benefits to RI, how do you assess and quantify the impacts due to climate change - sea level rise, increased storm damage, etc - along with the benefits to RI?	Sure. Thanks. So how much do we "save" or lessen by going 100% renewable? What is the economic value of going 100%? And does that economic value offset some of the added expense of going 100%?
4	The recordings of the previous webinars are not available at <a href="http://www.energy.ri.gov/100percent/">www.energy.ri.gov/100percent/</a> . Where can we find the recordings and not just the slides?	
5	Is it possible to get a copy of the slides?	Hi Lisa - Nick will answer. They will be available on the same website as previous presentations. Hope all is well! I am still having a lot of fun.
6	What about all the system costs and benefits addressed in docket 4600, like impact on energy security and impact on need for transmission/distribution investment?	Seth, we have included the incremental costs of transmission and distribution investments necessary to bring these resources onto the system
7	This is the thrid Webinar I've attended on the Next ZERO Initiative and I have not heard any mention of Geothermal - why? Very efficient whether Water and DX based, and COP's well over 4 too?	
8	Why is the cost for retail solar higher than wholesale?	
9	All of the messaging around things like offshore wind is how much it will save the ratepayers. Just so we understand, what you are stating is that Offshore WInd will actually cost the ratepayer more (as do any other technologies) rather than what the message being distributed by the developers. Is this an accurate understanding?	In some cases, a renewable project that has net costs over the life of a contract may still be seen as beneficial to the State when considering other positive externalities from that investment - tax payments, increased GDP, increased jobs, infrastructure investments, etc. In sum, projects need to be looked at individually and analyzed carefully to understand costs and benefits, and the potential impact on local consumers as well as the rest of our society.
10	Regardless of regulatory filings, doesn't any cost comparison need to include all costs and benefits? YTo ignore such a significant category of costs and benefits as energy system impacts leads to inaccurate conclusions. Reliance on local distributed generation has substantially different impacts on enegy security and reliance on transmission and distribution investment which have serious cost and other implications. Isn't a large part of our electric bill transmission costs?	
11	As another example, isn't the current need to rebury the cable for the BI offshore project indicative of energy security concerns that could impact the value related to overreliance on offshore wind?	

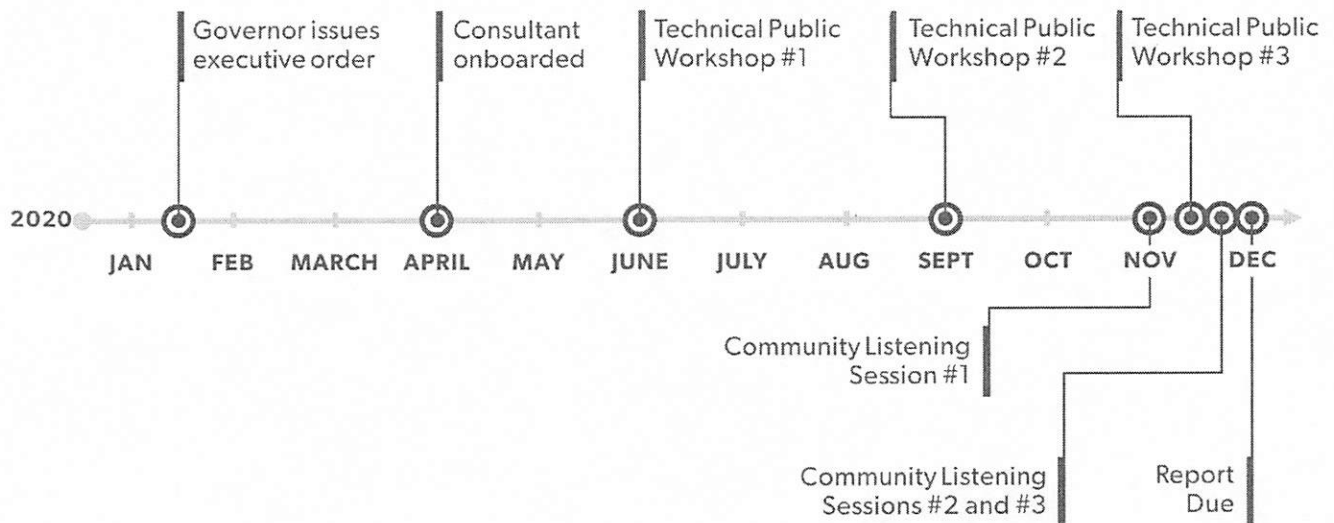


# Appendix: Summary of Stakeholder Engagement

Stakeholder engagement was a key component of this study, designed to learn from, engage and inform stakeholders. This Appendix contains an overview of the public comment process and summaries of the comments and questions received, along with the project team’s responses. Following that is a list of the organizations that provided comments, and demographic information that was shared by the attendees at the public technical workshops and the community listening sessions.

## A.1 Summary of Public Comment Process

To obtain feedback from a broad range of stakeholders and experts, the Office of Energy Resources held three public community listening sessions, three public technical workshops, and accepted written public comments from the start of the project through December 15, 2020. The technical workshops were held in June, September, and December with a primary focus on analytical methods, results, and policy implications. The community listening sessions were held in November and December and less technical in nature, with a focus on policy and programmatic recommendations. Meeting materials are available on [www.oregon.gov/energy](http://www.oregon.gov/energy).



energy.ri.gov/100percent/. Due to the COVID-19 pandemic, all workshops and listening sessions were conducted virtually. This Appendix summarizes feedback and written comments from these sessions, which helped to inform our final report.

In total, 13 written comments were received via email from stakeholders and organizations, and over 245 comments and questions were raised verbally or via virtual chat during the listening sessions and technical workshops. A list of over thirty-five organizations that provided input is provided near the end of this summary. In addition, aggregated demographic information provided by public participants is provided at the end of this section. Overall, summary statistics provide directional insights that suggest underrepresentation from several demographic groups.

This appendix does not include every comment received; however, it aims to thoroughly summarize comments and responses related to all three policy and programmatic recommendation categories: policy, planning & enabling, and equity. This appendix is organized into sections based on recommendations versus comments and concerns raised.

## Stakeholder Comments Related to Policy Recommendations

### Legislation

**Comment:** Stakeholders recommended working with the General Assembly to pass a 100% by 2030 Renewable Energy Standard (RES).

**Response:** *This recommendation is consistent with our policy recommendation to advance a 100% Renewable Energy Standard.*

**Comment:** Stakeholders asked clarifying questions about Renewable Energy Certificates (RECs) and their associated market. Some stakeholders suggested that meeting the 100% renewable electricity goal with RECs from across New England was appropriate. However, other stakeholders suggested a

preference for in-state development and associated economic development over the purchase of regional RECs. The issue of double counting RECs was also raised by a few stakeholders.

**Response:** *This recommendation is consistent with our proposal to define achieving 100% renewable electricity with an amended Renewable Energy Standard. The utilization of RECs establishes a verifiable mechanism to ensure compliance while facilitating renewable energy project financing. OER also acknowledges that counting RECs from local Distributed Generation is critical to tracking progress towards the 100% renewable electricity goal. Reporting on this is conducted annually by the Public Utilities Commission. We recognize there are tradeoffs between the comparative affordability of meeting the goal through procuring regional RECs versus delivering in-state benefits through local development, and will strive to maximize value to Rhode Islanders through policies and programs.*

**Comment:** Stakeholders recommended a form of carbon pricing mechanism to be proposed in legislation.

**Response:** *Carbon pricing may be a viable supplementary policy to promote economy-wide decarbonization but is outside the scope of this specific project.*

**Comment:** Avoiding greenhouse gas emissions and reducing the use of fossil fuels were major concerns for community members. Shutting down fossil fuel power plants was one desired outcome voiced by multiple stakeholders. These plants were described as contributing to local pollution and are often located near frontline communities.

**Response:** *Please refer to the sidebar, “Does ‘100% Renewable’ require shutting down all fossil generation in Rhode Island?” on page 10.*

**Comment:** Stakeholders voiced concerns over total ratepayer costs of achieving 100% renewable electricity.

**Response:** *Utility bills will increase regardless of our ultimate portfolio of renewable resources – but net economic and energy*

*benefits and costs will be determined by how that portfolio is shaped over time. Achievement of our clean energy future will require ratepayers to support investment to drive long-term energy, economic, and environmental benefits through charges on their bills. However, we must keep in mind that we are already facing increasing costs of a changing climate outside of utility bills, and the investments we make in a clean energy future will yield incremental energy, economic, and environmental benefits for Rhode Islanders, as demonstrated in our report.*

## **Renewable Energy Programs**

**Comment:** Stakeholders recommended the Renewable Energy Growth (REG) feed-in-tariff program be extended and expanded to provide in-state renewable energy development, allowing for pricing mechanisms to align energy development with policy goals.

**Response:** *This recommendation informed our policy recommendation to continue to support utility-scale renewable procurements and local renewable development that reflects evolving market conditions.*

**Comment:** Stakeholders recommended ensuring renewable energy programs were compatible with energy storage.

**Response:** *This recommendation is in line with the guiding policy implementation principle to build upon Rhode Island’s existing renewable energy programs and informs the planning and enabling recommendation to develop a strategic role for energy storage.*

**Comment:** Stakeholders voiced concerns about the Renewable Energy Fund (REF) incentive program, including scale and allocation of available funding. Stakeholders recommended REF be extended beyond its current 2022 sunset date and should evolve to address changing market conditions.

**Response:** *This recommendation informed our policy recommendation to continue to support utility-scale renewable procurements and local renewable development that reflects evolving market conditions.*

**Comment:** Stakeholders recommended that changing market conditions be monitored and studied. Specifically, stakeholders suggested that OER adapt policies and programs to changing circumstances and evaluate market conditions on a rolling basis, similar to other New England states.

**Response:** *This comment informs our policy recommendation regarding continued support for local renewable energy development and pursuing program evolution that may improve affordability and better respond to evolving market conditions.*

**Comment:** Stakeholders described concerns over renewable energy project siting – particularly project development in open space and environmentally sensitive lands – and recommended strategic action to alleviate siting concerns and protect greenspace. Stakeholders raised concerns over clear cutting forests to site renewable energy projects. The value of maintaining forests in order to combat climate change was described as an important priority.

**Response:** *Environmental protection is one example of a policy objective that should be pursued in parallel to decarbonization, consistent with our guiding policy implementation principle to ‘be consistent with other Rhode Island priorities and policies’. OER recognizes the authority of municipal governments in developing renewable energy zoning ordinances, and offers technical support as needed. The planning and enabling recommendation related to integrated grid planning attempts to bring key stakeholders together to explore how we may be able to integrate distributed energy resources in a manner that advances multiple policy objectives in parallel.*

## **Alternative Renewable Energy Resources**

**Comment:** Stakeholders recommended expanding the eligibility of existing small-scale hydropower to hedge against new resource delays and project attrition.

**Response:** *While hydropower may offer some limited in-state renewable energy generation, it is not recognized as a primary*

growth resource in Rhode Island and is not a significant part of the recommendations from this study. OER agrees that policies should ensure that all renewable technologies can compete to deliver renewable energy at cost-competitive prices to Rhode Island, consistent with the guiding economic principle to pursue cost-effective solutions.

**Comment:** Stakeholders recommended exploring nuclear capacity as a potential technology option for achieving 100% renewable electricity by 2030.

**Response:** Nuclear energy will continue to be a part of New England's generation portfolio for some time, represented by Connecticut's Millstone Nuclear Plan and New Hampshire's Seabrook facility. However, no new nuclear energy resources are planned for construction in the foreseeable future.

**Comment:** Stakeholders suggested that Rhode Island's capacity for land-based wind is a viable option to support the 100% renewable electricity goal.

**Response:** Land-based wind is indeed a viable option to support the 100% renewable electricity by 2030 goal. The analysis considers land-based wind as a Technology Bookend as well as a (small) component of mixed portfolio #10 commensurate with likely future opportunities for siting and development. A regional transmission solution might enable the development of materially more land-based wind than has been considered here, though that might not be in place in time for this technology to play a significant role in Rhode Island's 2030 goal.

**Comment:** Stakeholders recommended that geothermal energy be considered as a viable renewable energy technology.

**Response:** Even though geothermal energy is a potential source for power generation, it was not included in this study as the geothermal resources in New England do not produce electricity. Geothermal electricity production is only emerging in parts of the world where the earth is hot near the surface and is not a viable option in Rhode Island. Even if this resource were to progress, the technologies would most likely not be

available before 2030. Instead this study classified geothermal as a viable technology to reduce electricity demand.

## Stakeholder Comments Related to Planning and Enabling Recommendations Grid Modernization, Energy Storage, & Transparency

**Comment:** Various stakeholders were concerned that the topics of energy storage and grid modernization were not explicitly included in the analysis. It was also suggested that pre-discounted nameplate capacity values should also be considered when displaying solar PV forecasts to ensure that the scale of necessary development is clear.

**Response:** The analysis does not factor grid modernization, energy storage, or other advancements that may facilitate integration of distributed energy resources at this time. However, planning and enabling recommendations include support for such advancements, including exploring an integrated grid planning approach, continuing to drive recommendations related to Power Sector Transformation, and developing a strategic role for energy storage. Solar PV capacity needs shown in the analysis represent nameplate capacity. Further details about capacity factors and other assumptions used in the analysis can be found in the Technical Support Document.

## Stakeholder Comments Related to Equity

**Comment:** Stakeholders recommended that environmental justice and equity should be prioritized in the state's clean energy transition. Furthermore, stakeholders recommended that OER prioritize income-eligible residents and underserved communities.

**Response:** This recommendation informed our suite of equity recommendations to partner with frontline communities, develop and track equity metrics, and make adjustments to drive community-prioritized equity outcomes. Centering equity and including community engagement in program design is a main focus for OER, as it is one of our core principles.



**Comment:** Stakeholders supported the concept of an incentive adder for low- and moderate-income customers but raised concerns about the adder being overly restrictive. Stakeholders suggested prioritizing solar projects that benefit low- and moderate-income individuals.

**Response:** OER acknowledges that programs need to support more equitable outcomes and is committed to centering equity and including community engagement in program design to improve access to clean energy benefits for all Rhode Islanders. This recommendation informed the suite of equity recommendations whereby we will strengthen partnerships with frontline communities to identify ways in which we can drive community-prioritized outcomes.

**Comment:** Stakeholders voiced the importance of community engagement and recommended increasing public understanding of the benefits of renewable energy.

**Response:** Stakeholder and community engagement are critical for success, and recommendations like this informed the suite of equity recommendations. Specifically, we recommend partnering with frontline communities and community organizations and supporting communities such as by developing frameworks for more inclusive and accessible public meetings across the energy and environmental space. OER is committed to including community members and stakeholders in development, implementation, and decision-making for all project recommendations.

#### Stakeholder Comments Related to the Analysis

**Comment:** Stakeholders recommended additional detailed analysis for different categories of solar projects.

Stakeholders posit that high costs are due to large-scale solar, so focus should be shifted to rooftop projects that have lower interconnection costs along with a higher probability of completion with a shorter timeframe.

**Response:** The analysis differentiates between wholesale (utility-scale) and retail (small-scale) solar projects. Ranges in resource acquisition costs are reflected in the cost ranges provided for each portfolio. OER acknowledges that interconnection costs of distributed solar resources have risen over time and are likely to continue to do so without a more advanced, dynamic planning approach. Stakeholder concerns over interconnection costs and delays informed the planning and enabling recommendation related to integrated grid planning.

**Comment:** Stakeholders recommended the high-demand forecast be used for planning purposes.

**Response:** The Base load forecast was used for the analyses. Sensitivity analysis showed that load forecast uncertainty at the level assessed is a relatively modest contributor to overall cost uncertainty (higher load would result in higher overall costs, though not necessarily in higher unit rates.) The load forecast can be updated over time as 2030 approaches to adjust the amount of renewable energy that is targeted. In any case, even if the forecast is quite accurate, there will be some residual mismatch between the 2030 energy production of the renewable resources acquired and actual 2030 load, both of which are variable in response to weather and other factors. The structure of a 100% RES requirement enables matching renewable production to actual load by buying or selling RECs to resolve any residual mismatch. This is discussed in **SECTION II.C** above.

**Exhibit D**  
**Administrative Presumption Against Policy**

**STATE OF RHODE ISLAND  
PUBLIC UTILITIES COMMISSION**

**PETITION OF THE EPISCOPAL DIOCESE OF RHODE ISLAND FOR DECLARATORY JUDGMENT ON TRANSMISSION SYSTEM COSTS AND RELATED “AFFECTED SYSTEM OPERATOR” STUDIES** )  
 ) **DOCKET NO. 4981**  
 )  
 )

Pursuant to Rule 1.19 of the Commission’s Rules of Practice and Procedure, the Division submits the following objections and responses to the Data Requests (First Set) of the Episcopal Diocese of Rhode Island:

**GENERAL OBJECTION**

The Division objects to all of the data requests contained in the First Set in that they are beyond the scope of the Supreme Court’s Order dated March 24, 2021 (see e.g., Sansone v. Morton Mach. Works, Inc., 957 A.2d 386, 398 (R.I.2008) (holding that an inferior tribunal may not exceed the scope of the remand or open up the proceeding to legal issues beyond the remand.)). That Order explicitly provides:

This matter is remanded for the Commission to comply with G.L. 1956 § 39-5-5, with directions to hold a hearing *to consider the new evidence* and to provide findings of fact and citations to the rules upon which the Commission may rest its conclusion.

(Emphasis added).

By the clause “to consider the new evidence,” the Supreme Court clearly is referencing the production made by the Division in response to the Petitioner’s APRA request after the Attorney General ruled that the materials should be produced. The Supreme Court also explicitly required the Commission “to provide findings of fact and citations to the rules upon which the Commission” relied rather than forwarding the Supreme Court a transcript of its open meeting decision. Nowhere in its Order did the Supreme Court authorize the Petitioner to conduct additional

both believe, in accordance with long-established and accepted regulatory principles that cost causers, (specifically, Petitioner, in Docket No. 4981) must be responsible for the transmission upgrade and study costs that are the subject of the docket. Failure to adhere to this principle would produce unjust and unreasonable rates, and rates that in all probability, would be discriminatory, rife with preference and advantages, and/or unfair and anticompetitive.

**1-11 Explain how such a perceived “common interest” ensures the Division’s due regard for the preservation and enhancement of the environment as our general assembly deemed necessary to protect the health and general welfare of Rhode Island citizens.**

RESPONSE:

The Division objects to Data Request 1-11 on the grounds that it is geared to unduly harass the Division and that it seeks information that is neither relevant to the Supreme Court’s remand nor is reasonably likely to lead to the discovery of admissible materials and/or information. The Division also objects to Data Request 1-11 on the ground that it seeks a response based on the wholly erroneous assumption contained in the request that the Division’s sole charge is to regulate utilities to assure an abundance of energy supplied to the people with reliability, at economical cost, and with due regard for the preservation and enhancement of the environment.

**1-12 Explain how the Division could properly claim a common interest with a utility it is charged to regulate in a fair and non-discriminatory manner as to claims brought by a customer contesting the Company’s right to impose federal obligations on a renewable energy project interconnecting to Rhode Island’s distribution system under the Company’s distribution system interconnection tariff so that it could generate cheaper, cleaner and more secure renewable energy?**

RESPONSE:

The Division objects to Data Request 1-12 on the grounds that it is geared to unduly harass the Division and that it seeks information that is neither relevant to the Supreme Court’s remand nor is reasonably likely to lead to the discovery of admissible materials and/or information. The Division also objects to Data Request 1-12 on the ground that the request erroneously assumes that the Division must always support the generation of “cheaper . . . renewable energy.” Without waiving the foregoing objections, both the Company and the Division possess a common interest in ensuring the application of accepted ratemaking principles to ensure that transmission upgrade and study costs are not passed on to the general body of ratepayers, particularly when the energy that is produced by Petitioner’s project is subsidized by the general body of ratepayers and exceeds the cost of more traditional forms of energy within National Grid’s portfolio. It should also be noted that the Division was acting as a party/ratepayer advocate in this matter and not in its regulatory capacity.

# Presentation to NECEC

## Chairman Ron Gerwatowski, RI PUC



**Rhode Island Clean Energy Day**

**April 6, 2021**

Unanimous Agreement in Rhode Island  
On a Three-fold Goal:

Clean, Reliable, and Affordable Energy

# The PUC's Role and Focus Regarding Renewable Energy

- Support Initiatives that Prudently Advance Renewable Energy
- Facilitate Local Economic Growth from the Programs, while assuring that Rates Remain Just and Reasonable to Ratepayers
- Assure that the Benefits Exceed the Costs (both quantitative and qualitative)
- Protect Ratepayers from Over-paying for Benefits on their Electric Bills
- Seek the Most Cost Effective Solutions

# Status Check: Today's Electric Bill

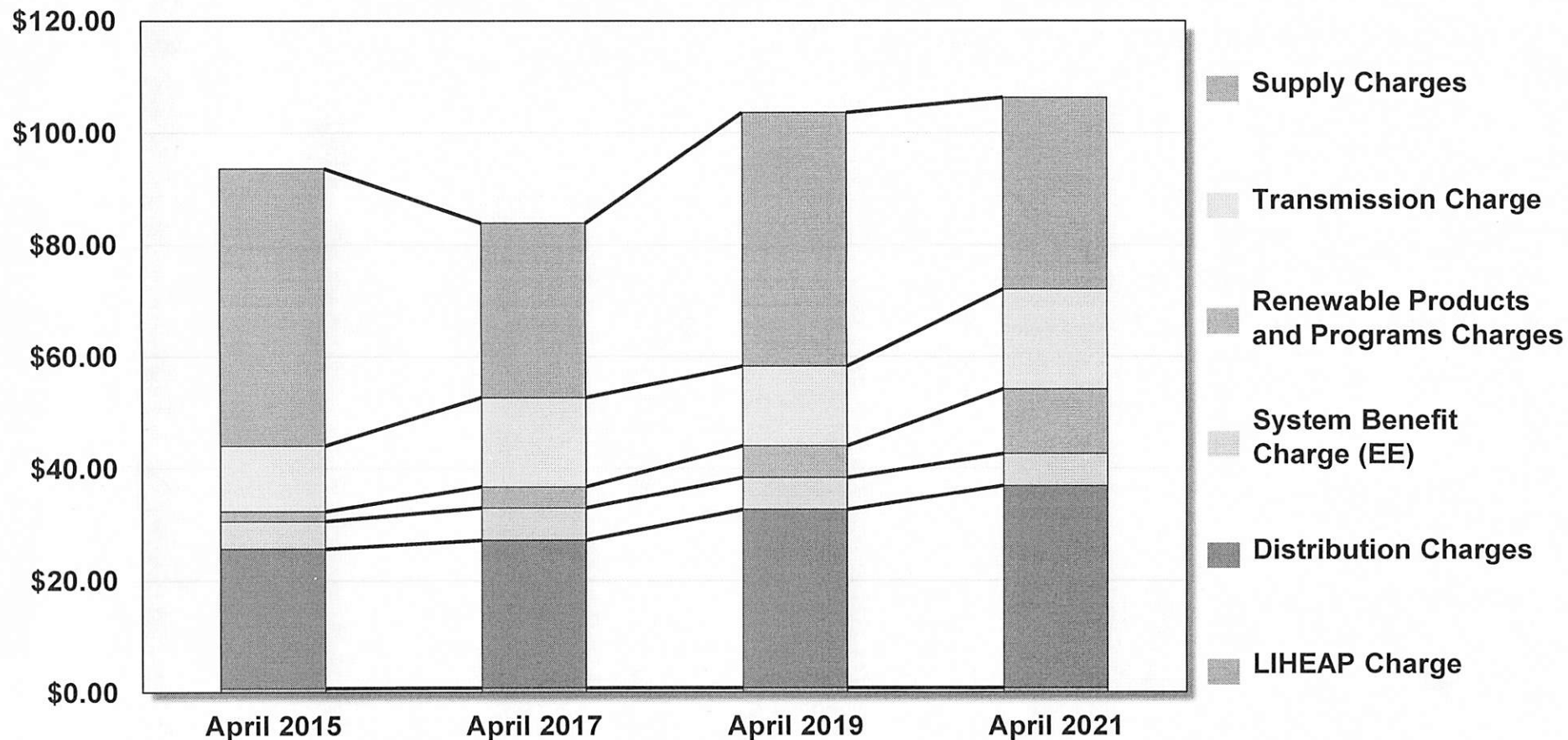
*Depressing Observation:*

**It's Not Fun Being Seen as #49 out of 50\*  
(even worse than Alaska)**

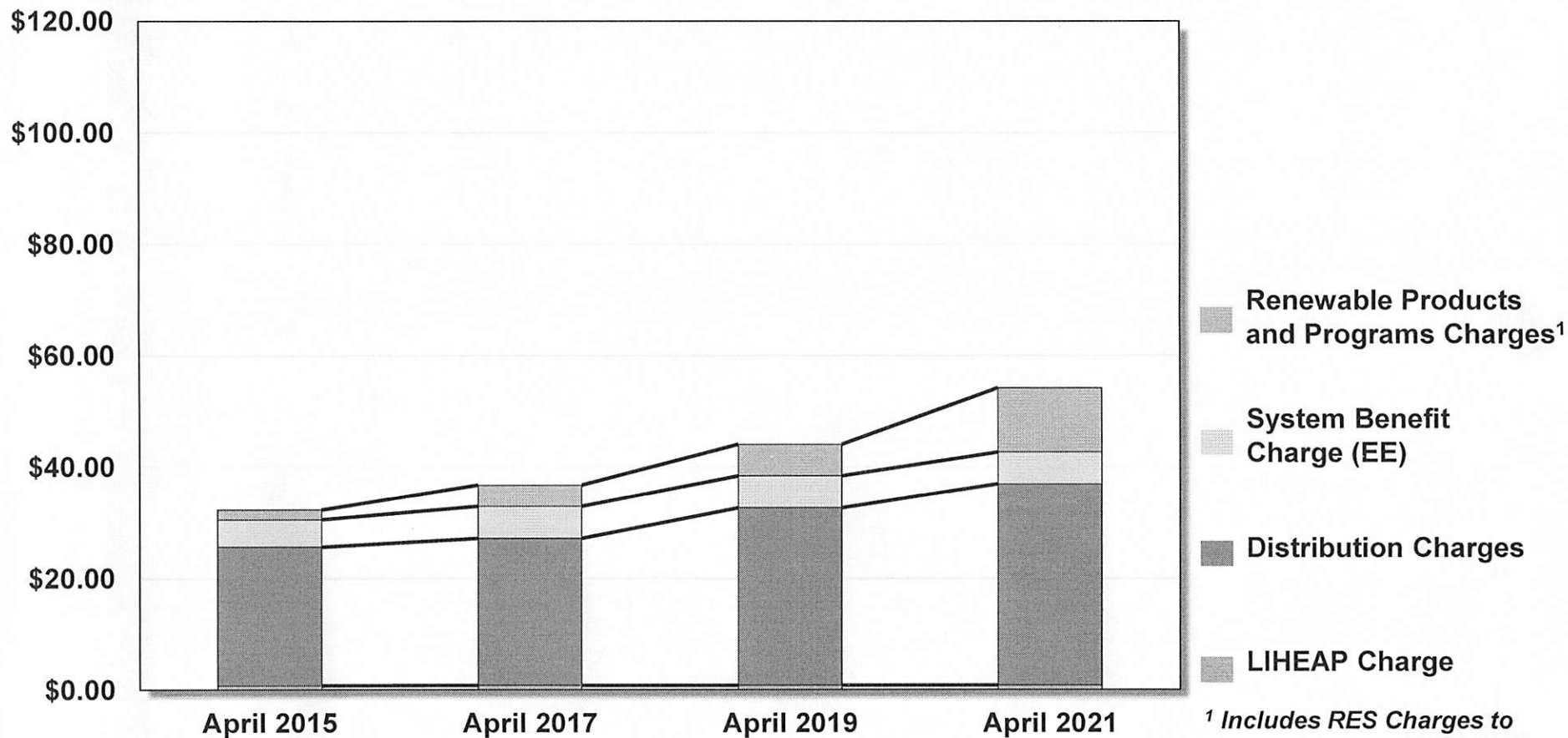
\*According to EIA, December 2020.



## Categorized Charges to a 500 Kilowatt-hour Residential Customer (A-16) with Standard Offer Service Supply



## Categorized Charges to a 500 Kilowatt-hour Residential Customer (A-16) State-Jurisdiction Delivery Rates Only



<sup>1</sup> Includes RES Charges to National Grid's Standard Offer Service Customers

# Managing that Green Bar

## Renewable Energy Resource Acquisition Costs, According to Brattle Group

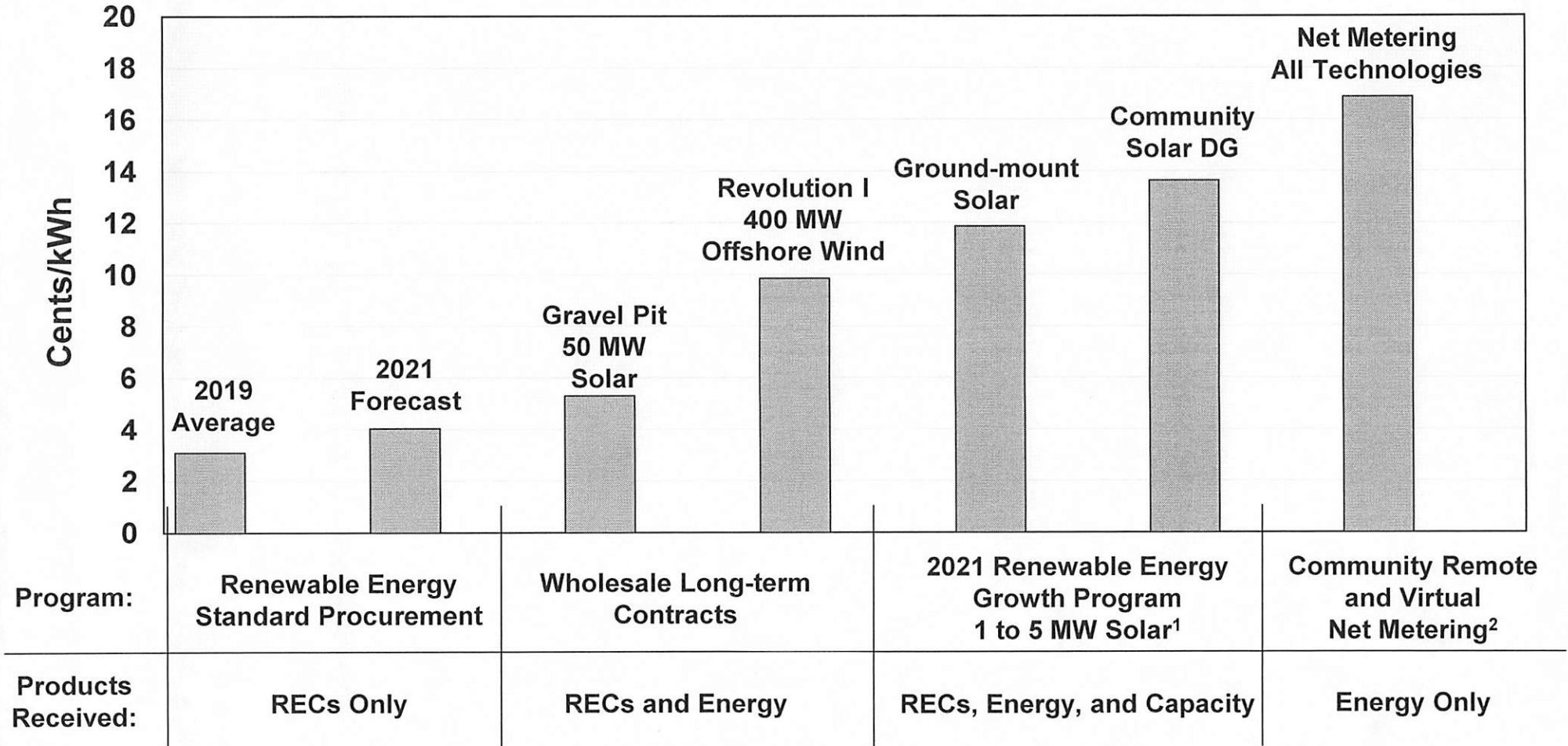


FIGURE 7: 2030 RESOURCE ACQUISITION COSTS

Note: Reflects the levelized \$/MWh cost of a new resource online in 2030, at Base Resource Cost, with range reflecting alternative High and Low Resource Cost assumptions.

Source: The Road to 100% Renewable Electricity by 2030 in Rhode Island, Brattle Group (December 2020)

# Ratepayer Payments for Facilities' Products Allowed in Various Renewables Programs

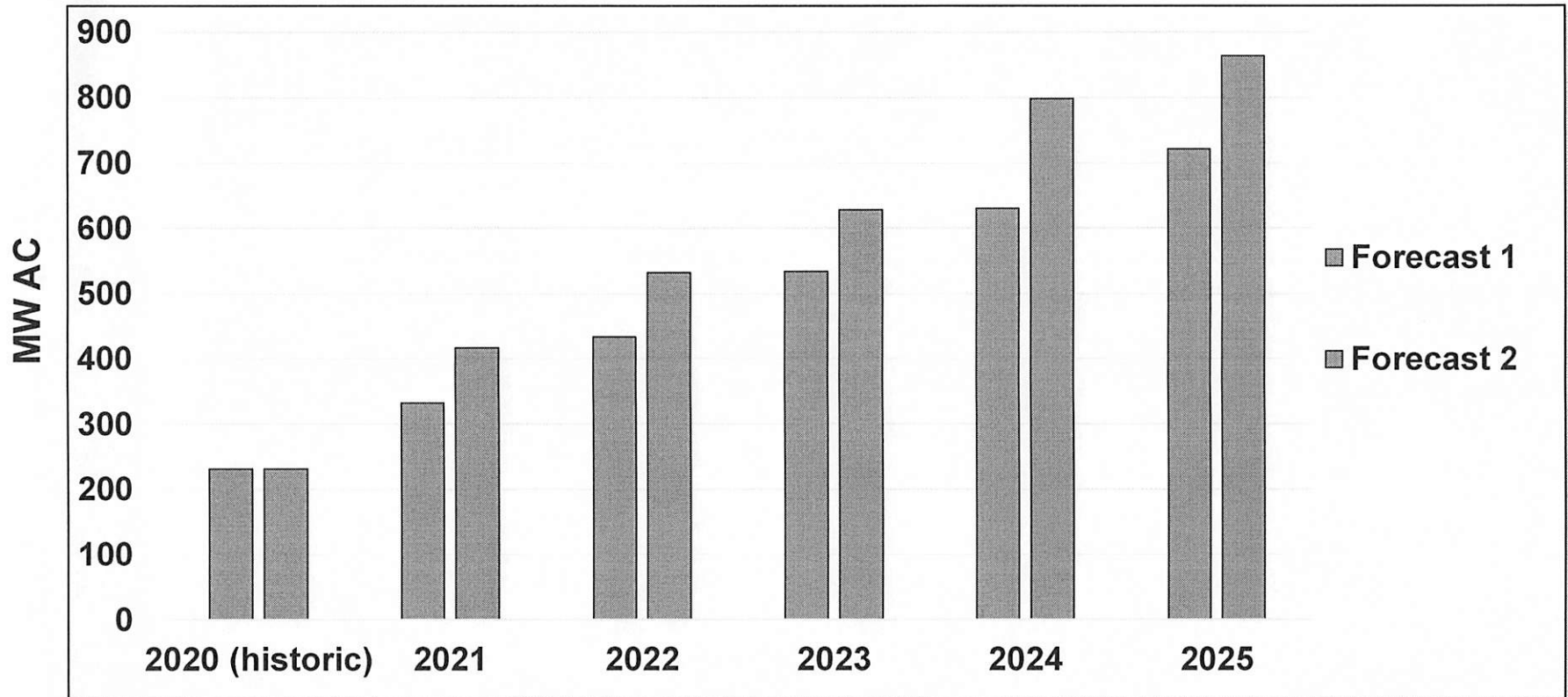


<sup>1</sup> Values are 2021 Program Year Ceiling Prices plus maximum applicable adders

<sup>2</sup> Value is C-06 Net Metering Credit Rate as of 3/1/21

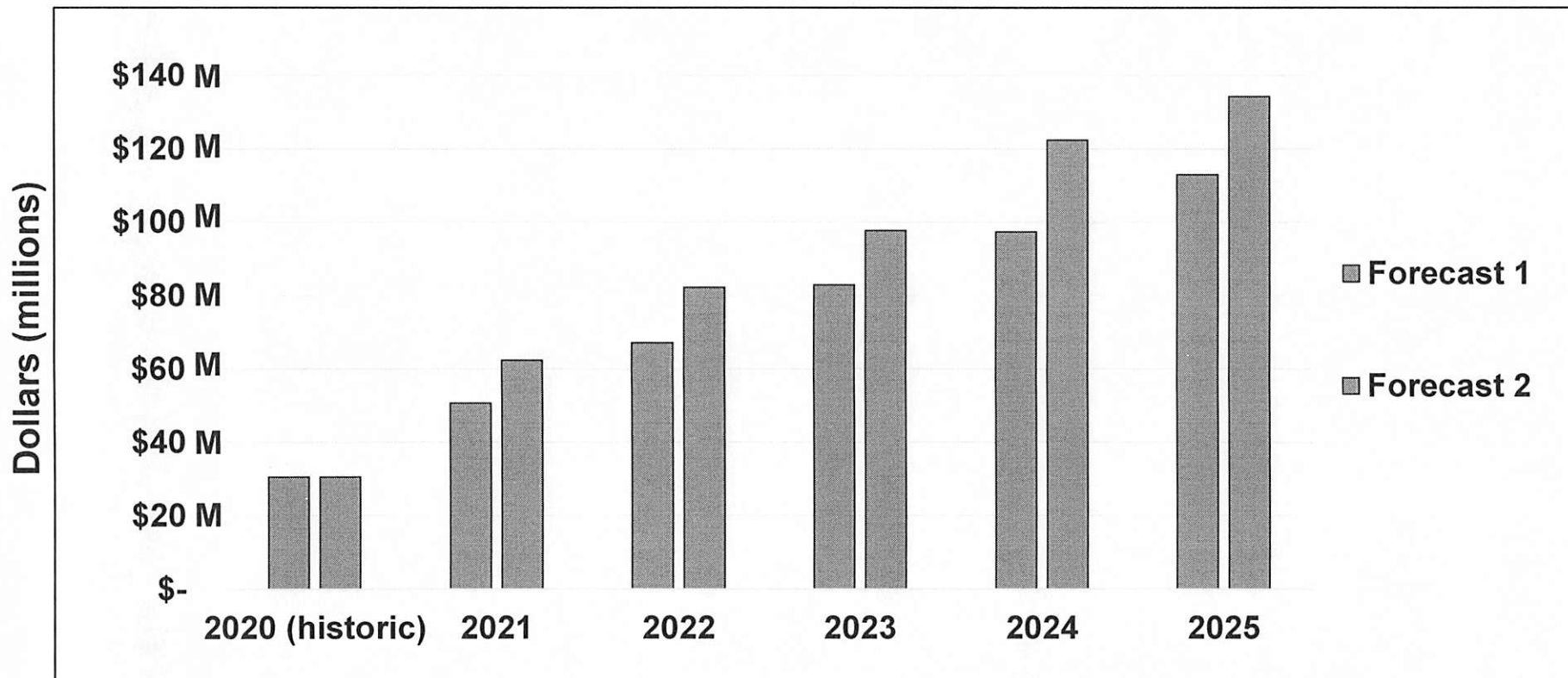
The Data:  
Growth of Projects  
Driven Largely by  
Remote Net Metering

## Cumulative NEM Capacity (based on data from National Grid\*)



\*Data response to PUC 3-4 in RI PUC Docket No. 5127  
Forecast 1 = Grid's PV forecast used in load forecasting  
Forecast 2 = based on data from current interconnection queue

## Estimated NEM Program Cost (based on data from National Grid\*)



\*Data response to PUC 3-4 in RI PUC Docket No. 5127

Forecast 1 = Grid's PV forecast used in load forecasting

Forecast 2 = based on data from current interconnection queue



The Challenge:

How Can We Continue Sustainable Local Growth  
Without Over-Stressing the Affordability of  
Electricity?

**Expand CRNM ?**

(Community Remote Net Metering)

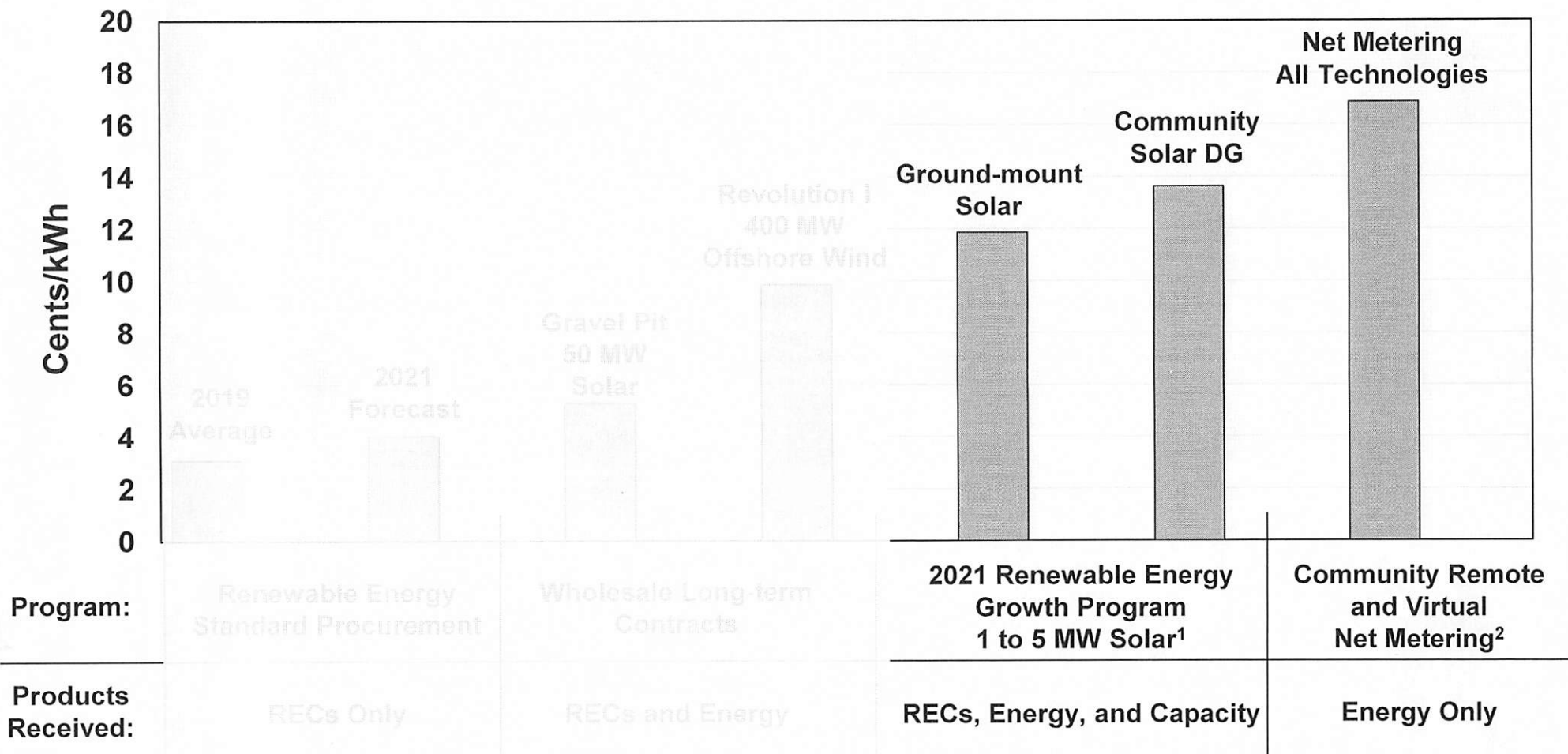
or

**Expand and Amend CRDG?**

(Community Remote Distributed Generation)

Renewable Energy Growth Program

## Comparison of CRDG and CRNM



<sup>1</sup> Values are 2021 Program Year Ceiling Prices plus maximum applicable adders 14

<sup>2</sup> Value is C-06 Net Metering Credit Rate as of 3/1/21

The Goal: Clean, Reliable, and Affordable Energy

If We Can Achieve More Green & Local Benefits  
at Lower Cost,  
Preventing “Clean” from Dwarfing “Affordable,”

Why Not Do It?