



Request for Information (RFI): Solar For All Application to U.S. Environmental Protection Agency (EPA) – Components of Potential Redesigned Community Remote Net Metering (CRNM) Program

DISCLAIMER: The following questions pertain to a potential expansion and redesign of the existing Community Remote Net Metering (CRNM) program. Though OER has been authorized, via the recently-enacted [Chapter 300 – An Act Relative to Public Utilities and Carriers – Net Metering](#), to design such a program and file it for the Rhode Island Public Utilities Commission’s potential approval, **the filing of such a program is contingent on the receipt of funds from the federal government for grants for eligible projects.**

Instructions: Please reply to the following questions below, to the best of your ability, on company or organizational letterhead, and send them to Cal Brown (cbrown@seadvantage.com) and Jacob Nichols (jnichols@seadvantage.com) at Sustainable Energy Advantage (SEA), copying Shauna Beland (shauna.beland@energy.ri.gov), Karen Bradbury (karen.bradbury@energy.ri.gov) and Abigail Hasenfus (abigail.hasenfus@energy.ri.gov). **Please note that all submissions will be posted publicly on the OER Solar for All application site, and please further note that submissions not on company or organizational letterhead received from companies or organization will be returned for reposting on company or organizational letterhead.**

Due Date: Friday, September 1, 2023 at 11:59 pm Eastern Time

Questions for Stakeholders

1. What are the barriers to Community Remote Net Metering (CRNM) development in Rhode Island that can be most effectively addressed by Solar For All funding?
2. Given the changes in solar siting law that passed in 2023,¹ what projects should be eligible for the CRNM program? In your response, please aim to consider the following criteria:
 - a. Maximum and minimum project capacity
 - b. Potential required project interconnection and permitting milestones
 - c. Timing and level of performance assurance/performance guarantee deposits
 - d. Term of qualification/reservation period (i.e., the maximum length of time from project qualification to Commercial Operation Date (COD) and any extensions
3. Should the program offer dual billing (in which customers receive separate bills for electric service and for community solar credits) or consolidated billing (in which billing for both services flows through the electric bill)? If consolidated billing, should the program employ net crediting (in which customers are provided a net bill credit in excess of the amount billed to community solar subscribers)?
4. Should the program allocate capacity differently across different project types (e.g., a carveout for rooftop and/or carport projects) or sizes (e.g., a carveout for medium scale projects)? If so, how much



- should be allocated and for what types/sizes, and how should the tariff be structured to account for different project categories?
5. Should Rhode Island Energy (RIE) or a third party administer the potential program? Similarly, should RIE or a third party manage customer enrollment? In your reply, please specifically consider whether the entity managing customer enrollment would have the ability or willingness to recruit customers from other means-tested assistance programs.
 6. What eligibility requirements for customer enrollment should there be?
 7. How should OER define low- and moderate-income (LMI) customer/off-taker for the purpose of program eligibility such that it is consistent with [Inflation Reduction Act of 2022](#) (IRA) requirements for projects serving low income and/or disadvantaged communities?²
 8. OER is not currently planning to assume that eligible community solar projects will qualify for bonus investment tax credits (ITCs), given that the tax credit program is limited to a maximum of 1,800 MW annually.³ Do you agree or disagree with this approach?
 9. How should projects be selected? Should projects be selected on a first-come, first-served basis, or should another approach be taken? For example, should OER or a separate program administrator specifically consider non-price factors (e.g., increased resiliency, project maturity metrics, potential bid preference for beneficial siting characteristics, geography (urban vs rural), siting on rooftops/carports).
 10. In recognition of the fact that Rhode Island statute requires that a revised CRNM program proposal must be justified with a benefit-cost analysis utilizing the Rhode Island Test developed in Rhode Island Public Utilities Commission Docket 4600 [Stakeholder Report](#) (and in light of the fact that a greater degree of transfer of title to wholesale energy, capacity and renewable energy credits (RECs) results in monetizable benefits for ratepayers), please indicate what attributes should be procured by RIE for resale (with their proceeds directly monetized by ratepayers) in exchange for program compensation.
 11. How should revenue from attribute sales in a future CRNM program be allocated to ratepayers? Would you support having the revenue disproportionately benefit residential low-income and/or disadvantaged community member customers?
 12. How should the program be designed to ensure sufficient consumer protection? Please aim to consider the following in your response:
 - a. The information that should be required to be conveyed to potential participants (e.g., subscription size; levelized cost or discount amount; roles of the solar owner, EDC, and customers; other contract terms);
 - b. Approaches for disclosure of the transfer of “green” claims if they subscribe to a CRNM project;



-
- c. The need/value of an approved vendor list of authorized CRNM providers (including CRNM developers and subscriber management companies).
13. How can the [RI Community Solar Marketplace website](#) be improved to make it more useful for developers and subscriber management companies?