



August 7, 2023

Christopher Kearns
Interim Commissioner
Office of Energy Resources
One Capitol Hill
Providence, RI 02908

RE: 2023 – A Plan for the Allocation and Distribution of RGGI Auction Proceeds

Dear Commissioner Kearns,

The Rhode Island Commerce Corporation (Corporation) appreciates the opportunity to provide comments in support of the Office of Energy Resources' (OER) proposed 2023-A Plan for the Allocation and Distribution of Regional Greenhouse Gas Initiative (RGGI) Auction proceeds. The 2023-A Plan, which allocates funds for the Renewable Energy Fund (which is administered by the Corporation), will stimulate additional development of small-scale and commercial scale photovoltaic projects for homeowners and small businesses in the State.

The Renewable Energy Fund was created to help expand the role of renewable energy throughout Rhode Island so that businesses and residents can reap the benefits of cost-effective energy from diverse sources. For over a decade, the Renewable Energy Fund has provided grants for hundreds of renewable energy projects that have the potential to produce electricity in a cleaner, more sustainable manner, while stimulating job growth in Rhode Island's energy sector.

The Renewable Energy Fund currently administers programs supporting small and large-scale solar, solar hot water, anaerobic digestion, small hydro, and wind energy technology grants. In recent years,

Renewable Greenhouse Gas Initiative (RGGI) funds have allowed expansion of the Renewable Energy Fund's programs to include new technologies, including energy storage, solar carports, and solar on brownfields. The proposed RGGI plan will continue to support existing programs and allow Rhode Island program administrators to provide relevant and impactful incentives to the State's institutions, non-profits, residents, and businesses in the future as energy costs continue to impact Rhode Island residents.

The proposed RGGI plan represents an important investment that supports the State's 100% Renewable Energy Standard (RES). As our State and the nation face challenges related to climate change, rising energy costs, and community resiliency, the Renewable Energy Fund is well-positioned to provide support, training, and resources to manage the growing demand for our programs.

Sincerely,

A handwritten signature in black ink, appearing to read "W. Ash".

William Ash
Interim President & COO
Rhode Island Commerce Corporation



Danielle Jameson

RI Office of Energy Resources
One Capitol Hill
Providence, RI 02908

August 30th, 2023

RE: Comments on 2023-A Plan for The Allocation and Distribution of Regional Greenhouse Gas Initiative Auction Proceeds

Dear Ms. Jameson,

Thank you for the opportunity to comment on the 2023-A Plan for The Allocation and Distribution of Regional Greenhouse Gas Initiative (RGGI) Auction Proceeds. Green Energy Consumers Alliance is a nonprofit organization with a mission to harness the power of energy consumers to speed the transition to a low-carbon future. We respectfully submit the following comments.

While the specific use of the funds generated from RGGI auction allowances varies from state to state, the overarching purpose is to generate revenue to invest in clean energy solutions. Therefore, Green Energy Consumers Alliance urges that the majority of Rhode Island's allocations be put towards programs that promote energy efficiency, renewable energy development, and beneficial electrification.

With that being said, we understand that addressing the immediate pressure of winter rate increases is vital, and rate-relief in the near term may be an appropriate use of RGGI funds in this limited instance. However, we would like to see the low-income discount rate increased permanently as a more effective solution. This approach would provide targeted support to vulnerable households, ensuring that they are shielded from the brunt of rate increases while allowing RGGI funds to be allocated towards their intended purpose of advancing clean energy initiatives. If the Office of Energy Resources were to propose this to the Public Utilities Commission, Green Energy Consumers would intervene in full support.

Furthermore, RGGI funds should be directed towards initiatives that may struggle to secure funding from conventional channels. For example, energy efficiency and renewable energy projects for Rhode Island state government facilities are better suited for funding through public tax dollars or state bond initiatives. Whereas programs for beneficial electrification such as the Heat Pump Program, DRIVE EV and E-bike programs may lack alternate funding sources, making RGGI funding pivotal in driving these programs forward and promoting impactful electrification without raising electricity rates. Thank you for your consideration of our comments.

Sincerely,

Amanda Barker

Amanda Barker
RI Policy Advocate, Green Energy Consumers Alliance
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