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## **Request for Comments on Rhode Island Renewable Energy Growth (REG) Incentive-Rate Adders and Siting Considerations for Potential 2024-2026 Program Year Period**

**Due Date:** October 31, 2023, at 11:59 pm Eastern Time (ET) 🎃👻

**Instructions:** Please send written comments in response to the below questions in a PDF attachment (preferably on organizational letterhead if applicable) to Cal Brown ([cbrown@seadvantage.com](mailto:cbrown@seadvantage.com)), copying Jim Kennerly ([jkennerly@seadvantage.com](mailto:jkennerly@seadvantage.com)), Toby Armstrong ([tarmstrong@seadvantage.com](mailto:tarmstrong@seadvantage.com)), Shauna Beland ([shauna.beland@energy.ri.gov](mailto:shauna.beland@energy.ri.gov)) and Karen Bradbury ([karen.bradbury@energy.ri.gov](mailto:karen.bradbury@energy.ri.gov)).

Please respond to the following questions regarding the REG project siting:

- 1) Should Superfund sites be deemed to be eligible for the “Brownfield” adder?
- 2) As part of the REG Open Enrollment and bid evaluation processes:
  - a) What additional information, if any, must bidders present during the bid process to substantiate the incremental capital and operating costs necessary to develop a project on an adder-eligible site?
    - i) What steps should Rhode Island Energy (or another entity) take to verify the incremental cost?
  - b) Should an entity other than Rhode Island Energy be responsible for verifying a determination by the Department of Environmental Management (DEM) that a particular Large Solar IV project is sited on a “preferred site”, as required by R.I.G.L. § 39-26.6-22?
  - c) Should an entity other than Rhode Island Energy be responsible for verifying a determination by DEM that a particular Landfill or Brownfield project “require(s) remediation”?
  - d) Should adder eligibility criteria require that the entire project be located within the land area designated as “requir(ing) remediation” to be eligible for an adder?
    - i) If not, what requirements should be adopted regarding adder eligibility for projects partially located on land designated as “requir(ing) remediation”?