



TO: Rhode Island Office of Energy Resources (OER) and the Distributed Generation Board (DG Board)

FROM: Rhode Island Energy

DATE: October 3, 2023

SUBJ: Response to Request for Comments on Renewable Energy Growth PY24-26 MW Allocation Plan

Rhode Island Energy respectfully submits the following comments and recommendations on the draft MW Allocation Plan for Renewable Energy Growth Program Years 2024-2026. Our objectives in submitting comments are twofold: (1) promote affordability through healthy competition for each class, resulting in more competitive bids and driving toward advancing the most cost-effective renewables for customers, and (2) class allocations should be grounded in historical participation trends.

Regarding Commercial Solar II: We note that the allocation might be a bit ambitious relative to past participation which may result in lack of competition. If the allocation were smaller but demand high, we note the possibility of reallocating from other classes to Commercial Social II for third-open enrollment if needed.

Regarding Large Solar I: We note that allocation may be too low in light of past participation. Given the affordability of the draft ceiling price, we recommend increasing the allocation for Large Solar I.

Regarding CRDG: We note that the number of projects awarded per class per year may be as low as one project. While this is good for creating a competitive bid process, it doesn't signal any room for anticipated growth in future years. We call this out just to give it attention, but don't offer any recommendations.

Regarding Large Solar II-IV: We suggest increasing the 2024 MW allocation to greater than zero to allow for some participation. There are 18 projects in the interconnection queue in either study or application stage that may be able to bid into the 2024 open enrollment.

Regarding Small Hydro and Anaerobic Digestion: We recommend separate MW allocations for each class rather than a combined MW allocation. In the event there is more project capacity bid than capacity available, RIE would most likely have to award the anaerobic digestion project(s) over the hydropower project(s), given the significant differences between the Small Hydro and Anaerobic Digestion ceiling prices.

Regarding Anaerobic Digestion: RIE recommends developing an adder for Anaerobic Digestors on landfills, as well as asks OER to consider if it is possible and advisable to increase the anaerobic digester eligible system size range.

Thank you for consideration of these comments!