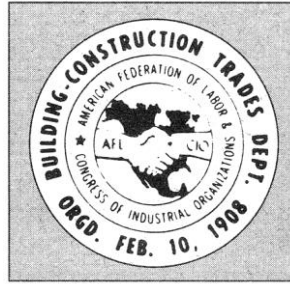


RHODE ISLAND



BUILDING TRADES

October 7, 2022

State of Rhode Island
Public Utilities Commission
Attn: Luly E. Massaro, Commission Clerk
89 Jefferson Boulevard
Warwick, Rhode Island

RE: Public Comments on OSW Docket 22-22-EL - The Narragansett Electric Company Draft Request for Proposals for Long-Term Contracts for Offshore Wind Energy Pursuant to the Affordable Clean Energy Security Act, P.L. 2022 ch. 371§ 1-4.

Dear Commissioners,

On behalf of the seventeen (17) Local Trade Unions and approximately 10,000 members that comprise Rhode Island Building and Construction Trades Council I submit the following comments regarding Rhode Island Energy's draft Request for Proposals for offshore wind projects under the Affordable Clean Energy Security Act (hereinafter "ACES"), P.L. 2022 ch. 371§ 1-4.

First, projects at larger scales have greater capacity to support family-sustaining jobs, local businesses, and will be able to provide the necessary workforce training, as well as the best way to maximize greenhouse gas reduction mandate; therefore, we strongly support distribution a project or series of projects that reach the maximum 1,000 MW per the statute.

Second, we encourage strict adherence to the language of the enabling legislation pertaining to apprenticeship utilization. Projects that utilize apprentices in construction, operations, and maintenance ensure that the skilled workforce needed to construct and maintain clean energy construction and maintenance jobs is developed.

Third, the Act on Climate legislation passed by the General Assembly explicitly requires the state to include an equitable transition to a net zero economy. Therefore,

scoring of non-price factors should account for at least half (50%) of the entire project evaluation. A specific emphasis should be placed on whether or not the developer intends to enter into a project labor agreement that includes apprenticeship and pre-apprenticeship utilization because including these criteria on these projects is the most effective way to open family-sustaining career opportunities for communities that need them most. With respect to labor peace agreements referenced in the legislation, apprenticeship and pre-apprenticeship utilization is incentivized within the statute, we urge that due consideration be given to apprenticeship and pre-apprenticeship utilization during contract negotiations and throughout the RFP.

We further believe that appropriate consideration should be given to criteria for minimizing volatility, regional habitat monitoring after construction, the potential adverse impact on the commercial fisheries industry, strategies that reduce costs and increase reliability, including regional transmission and optimized interconnection, financing ability, and operational viability.

Thank you for your consideration of our comments, if you have any questions, please do not hesitate to contact the undersigned.

Very truly yours,



Michael F. Sabitoni
President

cc: RI Building and Construction Trades Council