

**Via Electronic Mail**

October 7, 2022

Luly Massaro, Clerk  
Rhode Island Public Utilities Commission  
89 Jefferson Boulevard  
Warwick, RI 02888

**re: NECEC Comments on OSW Docket 22-22-EL**

Dear Ms. Massaro,

The Northeast Clean Energy Council (“NECEC”) appreciates the opportunity to submit these brief comments to the Rhode Island Public Utilities Commission (“PUC”) on The Narragansett Electric Co. d/b/a Rhode Island Energy’s Draft Request for Proposals (the “RFP”) for 600 MW to 1,000 MW of newly developed offshore wind capacity. This procurement of offshore wind is critical for Rhode Island to meet and sustain its 100% renewable electricity target by 2033. To combat the urgent climate crisis and grow the local clean energy economy, procurements like this are necessary. This RFP represents a significant opportunity to put Rhode Island on the right path.

NECEC leads the just, equitable, and rapid transition to a clean energy future and a diverse climate economy. NECEC is the only organization in the Northeast that covers all of the clean energy market segments, representing the business perspectives of investors and clean energy companies across every stage of development. NECEC members span the broad spectrum of the clean energy industry, including clean transportation, energy efficiency, wind, solar, energy storage, microgrids, fuel cells, and advanced and “smart” technologies.

At the outset, NECEC strongly supports procuring up to 1,000MW of much needed offshore wind power through this RFP. The time is right for Rhode Island to take advantage of the growing offshore wind sector for several reasons. First, it represents a large-scale source of renewable power that will contribute to Rhode Island’s new 100% Renewable Energy Standard through local power production. Second, it is an economic development opportunity that, if approached thoughtfully, can add to the diversity of the clean energy workforce while strengthening local supply chains. Finally, procuring significant amounts of offshore wind has the potential to deliver localized air quality benefits by displacing or deferring the use of fossil generation.

**Recognize Opportunities for Regional Coordination on Generation and Transmission**

As the PUC reviews the draft RFP, NECEC urges it to consider regional activities related to offshore wind generation and transmission. As a region, the northeast has made great strides in advancing offshore wind and associated grid infrastructure and all states can benefit from an increased awareness and coordination among their neighboring jurisdictions.

Transmission of OSW generated electricity to load in Rhode Island and throughout the region is a critical component of the overall clean energy transition. Rhode Island is already collaborating regionally with other states in New England with the Five State Regional Transmission Initiative Request for Information (“RFI”) and the RFP and evaluation of bids should reflect the possibility of a coordinated OSW transmission strategy.<sup>1</sup> Thus, NECEC encourages the PUC to direct Rhode Island Energy to provide flexibility for bidders to describe, if they choose to do so, how their proposed project would interconnect with a regional transmission system. In addition, NECEC agrees with the suggested edit to Section 2.2.3.4 offered by Anbaric Development Partners to allow for price reductions for Rhode Island customers where regional transmission strategies yield savings. (See Anbaric Comments at p. 5.)

#### Flexibility with Energy Storage

As the Commission knows, energy storage is a key enabler of Rhode Island’s clean energy transition. Storage can charge when renewable energy is plentiful and has the ability to discharge when and where electricity is needed most. It can facilitate and integrate high levels of distributed solar, electrified buildings, decarbonized transportation, and most importantly offshore wind even as Rhode Island is building out a more resilient and reliable electricity system. It is critical that the RFP has the flexibility and foresight for the usage of pairing storage with offshore wind. Thus, we urge that the RFP allow bidders to include energy storage strategies, including long duration (10+ hour) storage solutions, in their submissions where a quantifiable benefit or value can be demonstrated. (See RFP, Section 2.3.1.2)

#### Diversity, Equity, and Justice

NECEC believes that the transition to clean energy must be rapid, just, and equitable. The RFP offers an opportunity for bidders to demonstrate creative strategies in pursuit of a more equitable and just clean energy sector. We applaud the statutory requirement for a Diversity, Equity, and Inclusion (“DEI”) Plan in RFP responses and urge the PUC and Rhode Island to place particular emphasis on this element of the solicitation. Bidders should be encouraged to – and rewarded for – clear demonstrations of commitment to facilitating pathways for employment and contracting to historically marginalized communities. Included in any DEI plan should be (a) a bidder’s experience and track record in DEI and (b) a strategy for evaluating and monitoring the success of the DEI plan at specific points during the project development process.

In a related, but separate vein, NECEC encourages bidders to identify the energy justice elements of their proposals. Specifically, bidders should identify the strategies they will employ

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<sup>1</sup> New Regional Energy Transmission Infrastructure Initiative – Request for Information to Integrate Clean Energy Resources. Available at: <https://newenglandenergyvision.files.wordpress.com/2022/09/transmission-rfi-notice-of-proceeding-and-scoping-revised.pdf>

to engage communities (particularly environmental justice areas), minimize environmental harm, and deliver clean energy and other benefits to affected communities.

Conclusion

NECEC is quite enthusiastic about the RFP moving forward and is grateful to the PUC for the opportunity to submit our comments and for considering them. Please do not hesitate to contact us with any questions.

Sincerely,



Jeremy McDiarmid  
Vice President, Policy & Government Affairs



Greg Ohadoma  
Policy Associate