



September 30, 2022

Submitted Electronically via PUC.PublicComments@puc.ri.gov

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

RE: 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 R.I. Gen. laws Chapter 39-31

Dear Commissioners,

On behalf of Climate Jobs Rhode Island (CJRI), I respectfully submit the following comments on Rhode Island Energy's draft Request for Proposals for offshore wind projects under the Affordable Clean Energy Security Act, R.I. Gen. Laws ch. 39-31 (ACES). CJRI is a coalition of Rhode Island labor unions, environmental advocates, and community organizations that came together with the shared vision for a Just Transition to a green economy in RI. We are committed to working together to make RI a national leader in the development of an equitable, pro-worker, pro-climate, 21st Century economy.

I appreciate your consideration of our specific recommendations and look forward to working with you to embrace the full potential of offshore wind development in Rhode Island.

2.2.2.5 - Minimum/Maximum Contract Size and Allowable Alternative Bids

Climate Jobs RI energetically supports large offshore wind procurements, and deeply appreciates the required procurement within the Affordable Clean Energy Security Act of 600-1,000 MW. Projects at larger scales have greater capacity to support family-sustaining jobs, local businesses, and will be able to provide the necessary workforce training that elevates greater economic security in communities that need it most.

Furthermore, the best way for Rhode Island to carve into its greenhouse gas reduction mandate is to tap into large amounts of offshore wind. We therefore advocate for the distribution company to select a project or series of projects that reach the maximum 1,000 MW per the statute.

2.2.3.8 - Additional ACES Requirements

Climate Jobs RI appreciates the inclusion of project requirements outlined in ACES, specifically pertaining to part (f) of this section. We encourage the inclusion of the entire language outlined in subsections 1-2 of § 39-31-10(f) in the ACES statute, pertaining to apprenticeship utilization. Projects that utilize apprentices in construction, operations, and maintenance lead to a better trained and equipped workforce, simultaneously opening up career opportunities for people while unlocking the necessary skills in local communities for the clean energy jobs of the future.

2.3.3 Non-Price Evaluation

§ 39-31-6 and § 39-31-7 of the ACES statute require the state to provide an opinion on greenhouse gas and environmental impacts of the proposed project(s), **including “a determination as to whether the proposed project(s) advance the goals chapter 6.2 of title 42 (the 2021 Act on Climate).” We interpret this to mean all provisions contained within § 42-6.2 (Act on Climate).** The Act on Climate explicitly requires the state to include an equitable transition to a net zero economy. We therefore urge the distribution company to increase the scoring of non-price factors to account for half (50%) of the entire project evaluation. To advance these objectives in the Act on Climate, Climate Jobs RI believes total scoring of all factors (including both price and non-price factors) during Stage Two should be evaluated on a 250-point weighing scale. 125 attainable points should be considered for non-price factors, with weighting for each category as follows:

- **31 points: Economic Benefits to Rhode Island**
 - The ability of projects to strengthen Rhode Island’s economy and promote equity should be given the heaviest consideration among non-price factors. 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.
 - Providing apprenticeship opportunities on projects are one of the most effective ways to open family-sustaining career opportunities for communities that need them most.

2.5 Contract Negotiation Process

With respect to labor peace agreements referenced in ACES, apprenticeship and pre-apprenticeship utilization is incentivized within the statute. Climate Jobs RI urges the distribution company to highlight this part of the statute within the RFP and give due consideration to apprenticeship and pre-apprenticeship utilization during contract negotiations and throughout the RFP.

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

Sincerely,



Erica Hammond
Lead Organizer
Climate Jobs Rhode Island