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February 3, 2023

VIA HAND DELIVERY & ELECTRONIC MAIL

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

RE: Docket No. 22-39-REG
2023 Renewable Energy Growth Program Tariffs and Rule Changes
Pre-filed Rebuttal Testimony

Dear Ms. Massaro:

On behalf of The Narragansett Electric Company d/b/a Rhode Island Energy (“Rhode Island Energy” or the “Company”), I have enclosed a copy of the Pre-filed Rebuttal Testimony of Carrie A. Gill, Ph.D. in the above-referenced docket.

Thank you for your attention to this matter. If you have any questions, please contact me at (401) 709-3337.

Very truly yours,



Leticia C. Pimentel

Enclosure

cc: Docket 22-39-REG Service List

Certificate of Service

I hereby certify that a copy of the cover letter and any materials accompanying this certificate were electronically transmitted to the individuals listed below.

The paper copies of this filing are being hand delivered to the Rhode Island Public Utilities Commission and to the Rhode Island Division of Public Utilities and Carriers.

Heidi J. Seddon

February 3, 2023

Date

**Docket No. 22-39-REG – Renewable Energy Growth Program for Year 2023
The Narragansett Electric Company & RI Distributed Generation Board
Service List updated 11/29/2022**

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PRE-FILED DIRECT TESTIMONY

OF

CARRIE A. GILL, Ph.D.

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1 **I. Introduction and Qualifications**

2 **Q. Dr. Gill, please state your full name and business address.**

3 A. My name is Carrie A. Gill. My business address is 280 Melrose Street, Providence, RI,
4 02907.

5 **Q. By whom are you employed and in what capacity?**

6 A. I am employed by Rhode Island Energy as Senior Manager, Electric Regulatory Strategy.
7 My role is generally to advise internal strategy and support coordination regarding
8 regulatory matters. With respect to the RE Growth Program, I am Rhode Island Energy's
9 point person within external affairs and liaison with the DG Board. I provide strategic
10 direction on aspects of program design that may relate to Company objectives and State
11 policy, and provide interim assistance with some aspects of program administration.

12 **Q. Please describe your educational background and professional experience.**

13 A. I have a Ph.D. in Environmental and Natural Resource Economics from University of
14 Rhode Island (graduated 2017), a master's in business administration from University of
15 Rhode Island (graduated 2010), a master's in oceanography from University of Rhode
16 Island (graduated 2010), and a bachelor's of science in physics and mathematics from
17 Loyola University, Maryland (graduated 2007).

18 I have worked for Rhode Island Energy since July 2022. Previously I worked for the
19 Rhode Island Office of Energy Resources (2017-2022), ending my tenure as Chief
20 Economic and Policy Analyst. In addition to various research and teaching positions for

1 the University of Rhode Island, I have also conducted consulting work for a solar thermal
2 developer in Washington, DC (2012), and was a Knauss Fellow at the U.S. Department
3 of Energy's Wind and Water Power Program (2011-2012).

4 **Q. Have you testified previously before the Rhode Island Public Utilities Commission**
5 **("PUC")?**

6
7 A. Yes, I have testified before the Rhode Island Public Utilities Commission in my prior role
8 with the Rhode Island Office of Energy Resources, but this is my first time testifying in
9 my role with Rhode Island Energy.

10 **II. Purpose of Testimony**

11 **Q. What is the purpose of your testimony?**

12 A. The purpose of my testimony is to respond to the direct testimony of Michael W.
13 Brennan filed on behalf of the Division of Public Utilities and Carriers ("Division") on
14 January 24, 2023.

15 **Q. Are you sponsoring any attachment with your testimony?**

16 A. Yes, I am sponsoring the following attachment with my testimony:

- 17 1. Schedule RIE-1 – REG Small-Scale – Request for Reallocation Presentation, for
18 consideration by the DG Board on 10/24/2022.

19

1 **III. Response to Division Testimony**

2 **A. Ceiling Price**

3 **Q. Does the Company support the ceiling prices that include post-tariff revenue?**

4 A. Yes. The Company agrees with the Division that the PUC should approve the ceiling
5 prices that are inclusive of post-tariff revenue.

6
7 **Q. Why does the Company support the ceiling prices that include post-tariff revenue?**

8 A. The Company is in support of the ceiling prices that are inclusive of post-tariff revenue
9 because the Company considers these prices to be more aligned with the Renewable
10 Energy Growth statute, specifically § 39-26.6-23, than the ceiling prices that do not
11 include post-tariff revenue. By including post-tariff revenue in the calculation of ceiling
12 prices, we recognize that the project assets have value beyond the term of the Renewable
13 Energy Growth Tariff. Incorporating and internalizing this value in the ceiling prices is
14 an appropriate economic decision given the statutory language allowing these assets to
15 receive net metering credits following the tariff term.

16 **B. Reallocation to Small-Scale Solar**

17 **Q. Please describe the change the Company is proposing to the Solicitation and
18 Enrollment Process Rules for Small-Scale Solar Projects.**

19 A. The Company is proposing to add the following language to the Solicitation and
20 Enrollment Process Rules for Small-Scale Solar Projects (“Small-Scale Solar Rules”):

21

1 “If there is an over-subscription in one class and an under-subscription in an enrollment
2 MW target, then Rhode Island Energy, the OER, and the Board may mutually agree to
3 allocate megawatts from one class to another class within the RE Growth Program
4 without Commission approval as long as the re-allocated targets would not exceed the
5 annual MW Target.”
6

7 **Q. Why is the Company proposing to add the reallocation language noted above to the**
8 **Small-Scale Solar Rules?**

9 A. The Company is proposing to make this addition to the Small-Scale Solar Rules to
10 formalize the practice of reallocation of the small-scale solar megawatt target, which is
11 permitted pursuant to Rhode Island law and has been the Company’s practice. This
12 language provides clarity and consistency between the Small-Scale Solar Rules, Rhode
13 Island law, and the Company’s practice.
14

15 **Q. Please provide support for the Company’s assertion that reallocation to the small-**
16 **scale solar megawatt target is permitted pursuant to Rhode Island law?**

17 A. Rhode Island General Laws § 39-26.6-12(b) provides:
18 “During each program year, the tariff enrollments shall have both an annual targeted
19 amount of nameplate megawatts (“annual MW target”) and a nameplate megawatt target
20 for each separate enrollment event (“enrollment MW target”). The enrollment MW target
21 shall comprise the specific portion of the annual MW target sought to be obtained in that

1 enrollment. The enrollment MW targets shall be recommended by the board each year,
2 subject to commission approval. The board shall also recommend a megawatt target for
3 each class (“class MW target”) that comprises a specified portion of the enrollment MW
4 target, subject to commission approval. If the electric-distribution company, [OER], and
5 the [DG Board] mutually agree, they may reallocate megawatts during an enrollment
6 from one class to another without commission approval if there is an over-subscription in
7 one class and an under-subscription in another, provided that the annual MW target is not
8 being exceeded, except as provided in § 39-26.6-7.” (Emphasis added)
9

10 **Q. Does the proposed edit to the Rules represent a change to the Company’s current**
11 **practice of reallocation as it pertains to the small-scale solar megawatt target?**
12 **Please describe.**

13 A. No. The proposed edit to the Rules does not represent a change to the Company’s current
14 practice of reallocation as it pertains to the small-scale solar megawatt target. In instances
15 when there is an over-subscription in one class and an under-subscription in another
16 class, the Company seeks approval from OER and the DG Board for the proposed
17 reallocation. Reallocation has occurred between both small-scale solar and larger classes.
18 Most recently, on October 24, 2022, the Company sought and acquired OER’s and the
19 DG Board’s approval to reallocate 8.43143 megawatts to the Small-Scale Solar Program.
20 *See* Schedule RIE-1.
21

1 **Q. Is the Company proposing any substantive changes pertaining to reallocation of**
2 **megawatt targets to the Solicitation and Enrollment Process Rules for Solar (Greater than**
3 **25 kW), Wind, Hydro and Anaerobic Digester Projects?**

4 A. No. The language proposed to be added to the Small-Scale Solar Rules is already present
5 in the Solicitation and Enrollment Process Rules for Solar (Greater than 25 kW), Wind,
6 Hydro and Anaerobic Digester Projects. The only change the Company is proposing is to
7 clarify that “another class” in the text of the Rules references the classes within the
8 Renewable Energy Growth Program. As such, the Company proposed the following
9 minor revision to the Solicitation and Enrollment Process Rules for Solar (Greater than
10 25 kW), Wind, Hydro and Anaerobic Digester Projects:

11
12 “If there is an over-subscription in one class and an undersubscription in an enrollment
13 MW target, then ~~National Grid~~ Rhode Island Energy, the OER, and the Board may
14 mutually agree to allocate megawatts from one class to another class within the
15 RE Growth Program without Commission approval as long as the re-allocated targets
16 would not exceed the annual MW Target.

17
18 **Q. The Division’s testimony states the following “The Division believes that the**
19 **provision allowing for changes in allocations among the larger scale classes is**
20 **appropriate because these classes generally have better economies of scale and lower**
21 **costs than the small solar class, including the impacts of competitive bidding.**

1 **Additionally, as noted earlier in my testimony, net metering alternatives exist,**
2 **without limit, for small solar customers.” Please discuss how the Company views**
3 **these relative economics.**

4 A. The Renewable Energy Growth program is less costly for customers than net metering. In
5 the instances when the Company proposes reallocation, and OER and the DG Board find
6 sufficient justification to approve the reallocation, it would be appropriate for the
7 Company to discuss the relative economics and resulting impacts of the two options at
8 hand (do nothing or reallocate). The presentation provided to the DG Board
9 accompanying its most recent request for reallocation is evidence that the Company does
10 consider relative economics and programmatic costs to customers. In this presentation,
11 the Company noted that there was a high likelihood of megawatts going unused in the
12 non-small-scale classes, while the Company would be faced with turning away
13 participation in the small-scale solar class. The alternative for would-be small-scale solar
14 participants is indeed net metering. However, the Company requested reallocating
15 megawatts to the small-scale solar class because (1) REG is a less costly program for
16 customers than net metering, so encouraging participation in REG was in the best interest
17 of customers, (2) it was highly unlikely that reducing megawatts in non-small-scale
18 classes would prevent participation from those projects with economies of scale and even
19 lower programmatic costs to customers, and (3) the reallocation would increase
20 participation consistent with the statutory intent of reaching the total programmatic MW

1 goal over the life of the REG program and with the 2021 Act on Climate greenhouse gas
2 emissions reduction mandates.

3

4 **IV. Conclusion**

5 **Q. Does this conclude your testimony?**

6 A. Yes, thank you.



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REG Small-Scale – Request for Reallocation

For consideration by the DG Board on 10/24/2022



Summary of Presentation

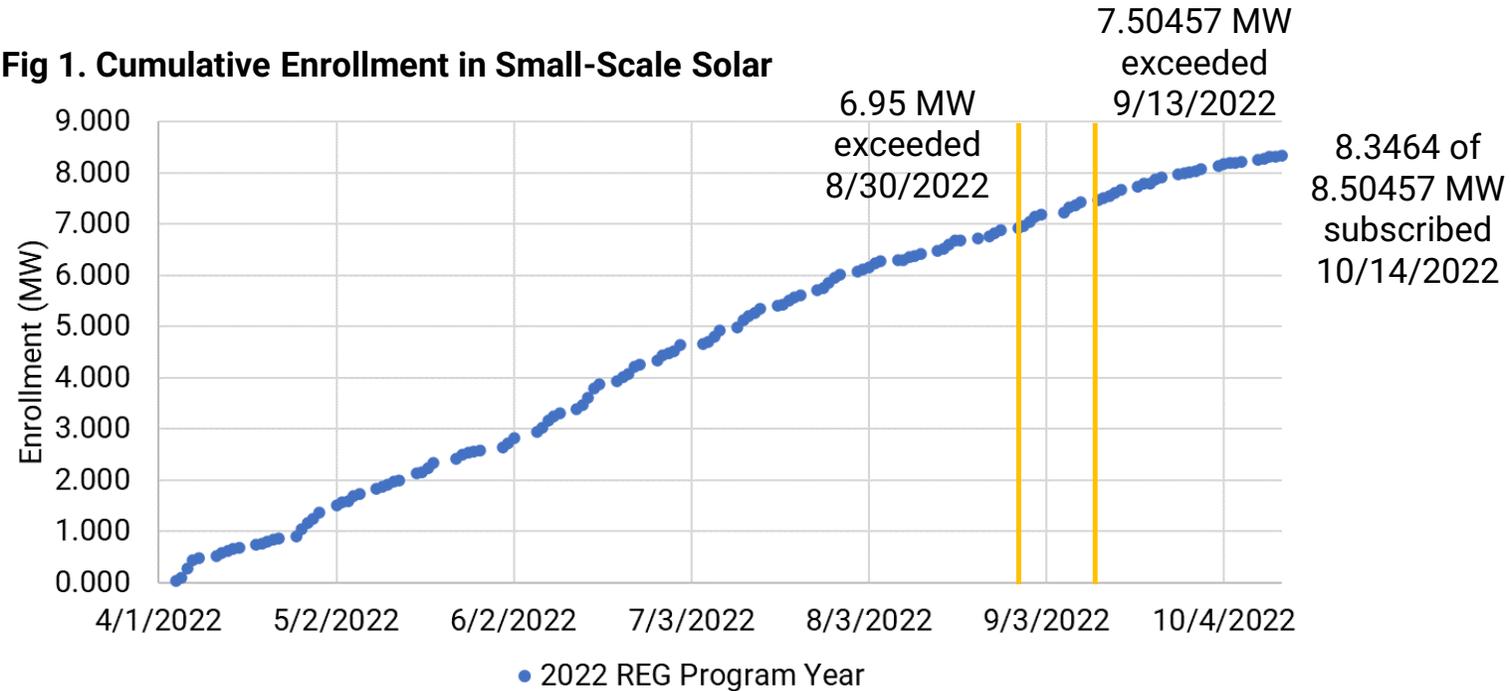
- Small-scale is nearly oversubscribed
- Are we allowed to reallocate? Yes
- Should we reallocate? Yes
 - Program rules specify we recalibrate ceiling price annually (not intra-annually)
 - Reallocation would not preclude more economical (medium- and large-scale) projects
 - Reallocating is the least programmatically costly path for ratepayers
 - Reallocating aligns with the 2021 Act on Climate
- Requested reallocation
 - How much should we reallocate? *8.43143 MW*
 - When should we reallocate? *Once, immediately*
- Summary of the request



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Small-Scale nearly full as of 10/14/2022

Fig 1. Cumulative Enrollment in Small-Scale Solar



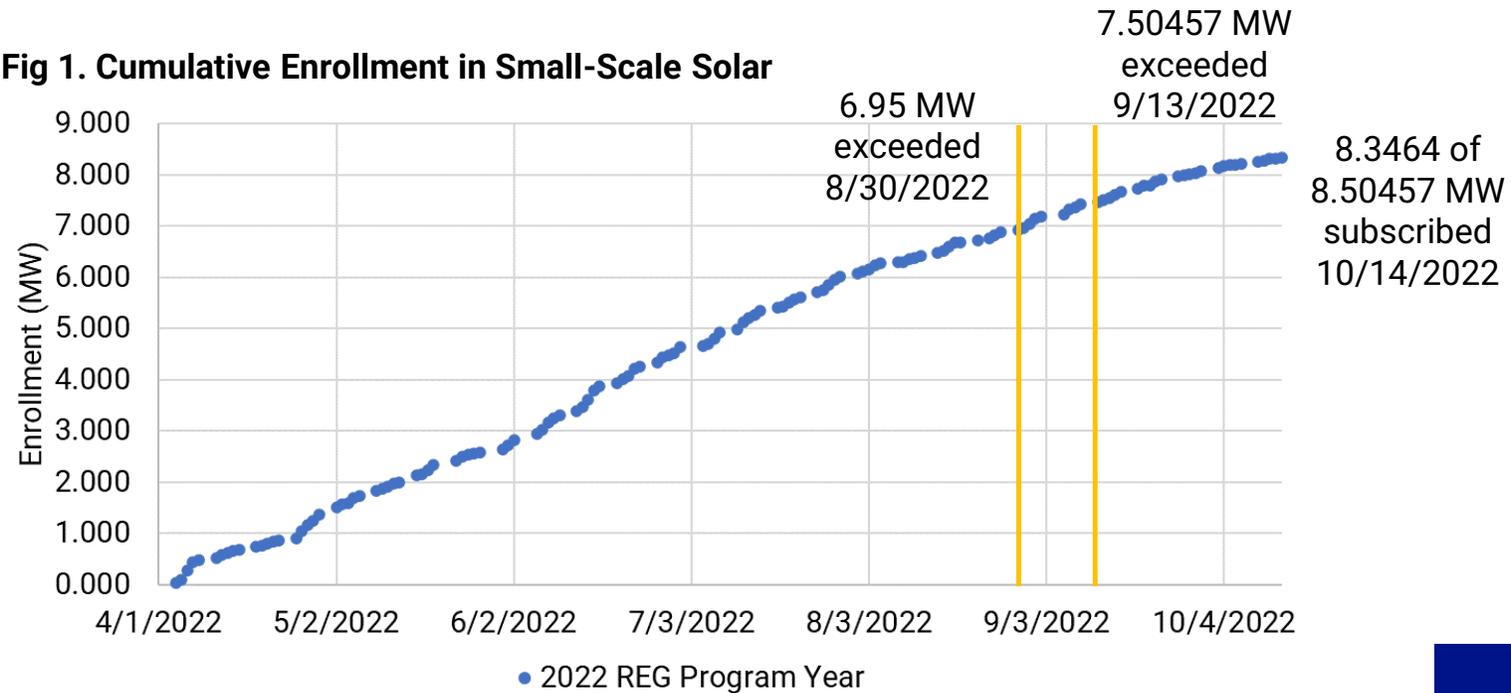
Notes: The 2022 REG Program Year is 4/1/2022-3/31/2023. Data are from 4/1/2022-10/14/2023. Enrollment is cumulative nameplate rating in MW DC. Initial allocation was 6.95 MW (left-hand orange reference line). The first reallocation on 8/29/2022 resulted in a program cap of 7.50457 MW (right-hand orange reference line). The second reallocation on 9/26/2022 resulted in a program cap of 8.50457 MW. Applicants who submit applications after the cap has been exceeded are told that they are accepted contingent on consideration and approval of a cap increase.



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Small-Scale nearly full as of 10/14/2022

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Notes: The 2022 REG Program Year is 4/1/2022-3/31/2023. Data are from 4/1/2022-10/14/2023. Enrollment is cumulative nameplate rating in MW DC. Initial allocation was 6.95 MW (left-hand orange reference line). The first reallocation on 8/29/2022 resulted in a program cap of 7.50457 MW (right-hand orange reference line). The second reallocation on 9/26/2022 resulted in a program cap of 8.50457 MW. Applicants who submit applications after the cap has been exceeded are told that they are accepted contingent on consideration and approval of a cap increase.

Not increasing the cap will likely result in rejecting applicants.



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RIE is allowed to reallocate

- RIE, with mutual agreement OER and the DG Board, may reallocate capacity among classes as long as the total aggregate capacity for the entire program does not exceed the annual program target. (To exceed the total annual target for the entire program, PUC approval is required.)
- PDF Page 34 (of 199) or Schedule NG-2, Page 3 of 19 of the [Rhode Island Renewable Energy Growth Program Solicitation and Enrollment Process Rules for Solar \(Greater than 25 kW\), Wind, Hydro and Anaerobic Digester Projects](#) states that

“[i]f there is an over-subscription in one class and an undersubscription in an enrollment MW target, then National Grid, the OER, and the Board may mutually agree to allocate megawatts from one class to another without Commission approval as long as the re-allocated targets would not exceed the annual MW Target.”

- This rule is in the large-scale program rules; small-scale program rules are silent about reallocation.
- The rule above does not expressly exclude small-scale solar as a class. Given the intent of the program, RIE posits it is in the best interest of the program, participants, and ratepayers to allow reallocation and apply the rule above to all classes.
- There is an over-subscription in small-scale solar and an undersubscription in many medium- and large-scale classes, therefore RIE, OER, and the DG Board may mutually agree to allocate megawatts from one class to another.



Should we reallocate?



IRA Incentives

Do intra-year changes in economic landscape require a change to program specifications?



REG Small v Large

Does reallocation prevent more economical REG projects?



REG v NEM

Is reallocation likely to result in ratepayer savings?



Decarbonization

To what extent does reallocation align with 2021 Act on Climate?



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IRA Incentives

- Inflation Reduction Act provides incentives (via tax credits) to renewable energy projects.
 - The IRA was signed into law mid-Program Year. Therefore, IRA incentives were not accounted for in development of ceiling prices.
 - Not accounting for incentives means that the costs assumed in ceiling price development are higher than actual costs today.
 - Therefore, the ceiling prices are likely higher than necessary with today's actual costs.

 - However, program rules specify a robust annual recalibration.
 - More frequent and unplanned recalibration may result in market slowdowns and disruption.
 - We are not opposed to exploring changes to the rules to accommodate situations like this, but would only do so prospectively.
- Therefore, despite ceiling prices being sub-optimally calibrated to today's economic context, we think it is appropriate to stick with the annual recalibration.



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REG Small v Large

- We would not want to preclude projects from the proposed allocation plan.
- However, we are past the third open enrollment period and are confident there will be excess capacity in medium- and large-scale classes.
- Therefore, we will not preclude participation if we reallocate.
- We would not want to encourage more programmatically expensive projects than necessary.
- Small-scale projects are more programmatically expensive than larger class projects.
- However, there is unused capacity in larger classes that would go unused otherwise.
- Therefore, reallocating to small-scale would not prevent projects with lower programmatic costs.
- We do not need to specify from which class we reallocate.
- At the end of the program year, all unused capacity is summed and then redistributed according to a future program year's allocation plan.
- Therefore, reallocating from, say, Large-Scale Solar is functionally identical to reallocating from Wind.



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REG v NEM

- We would not want to encourage small-scale projects to go through a more programmatically expensive program pathway.
- There are only two alternatives for small-scale projects: REG and Net Metering (NEM).
- Closing Small-Scale REG would mean all small-scale projects would need to net meter.
- NEM is more programmatically expensive for ratepayers than REG.
- Therefore, encouraging participation in REG – via reallocation – is a better deal for ratepayers.



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Decarbonization

- We want our programs to signal to the market that clean energy projects are supported.
- Not reallocating to Small-Scale would pause REG entirely from November 2022 through March 2023.
- Pausing the REG program would signal to the market that incentives are not available and/or not reliable.
- These market signals may disrupt or slow clean energy deployment, which is inconsistent with Rhode Island's climate mandates.
- Therefore, reallocating is consistent with climate mandates.



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Findings



IRA Incentives

Despite ceiling prices being sub-optimally calibrated to today's economic context, we think is it **appropriate to stick with the annual recalibration.**



REG Small v Large

We will not preclude participation if we reallocate and reallocating to small-scale would **not prevent projects with lower programmatic costs.**



REG v NEM

Encouraging participation in REG – via reallocation – is a **better deal for ratepayers.**



Decarbonization

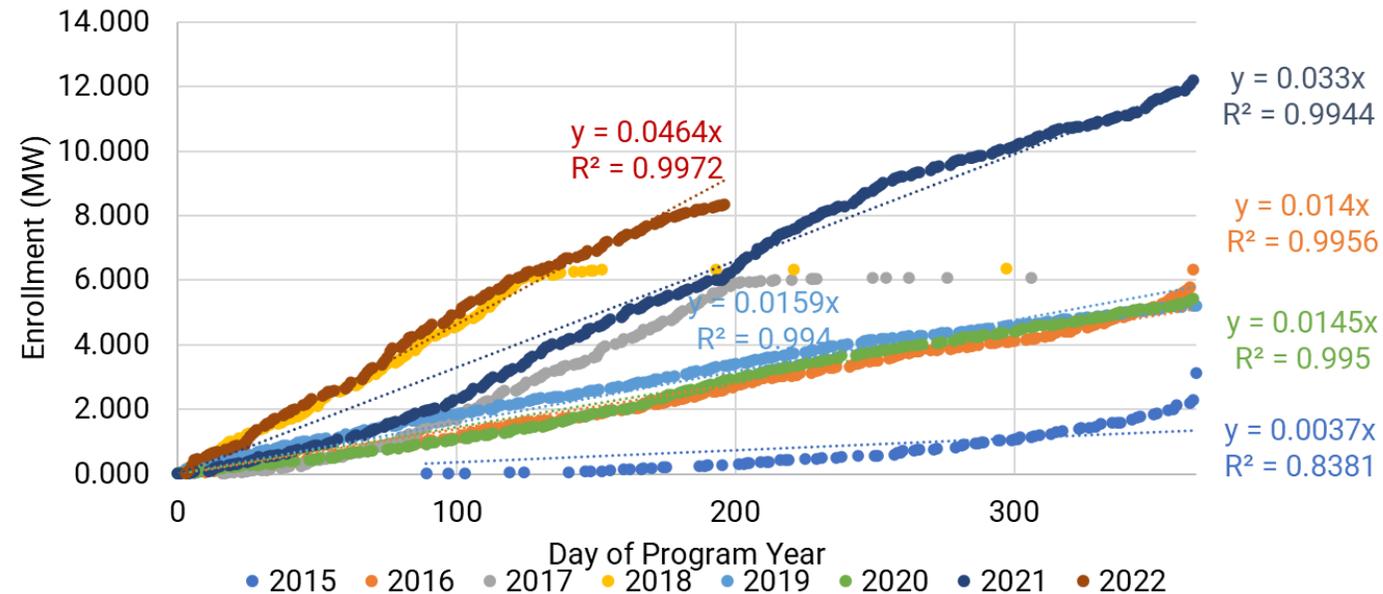
Reallocating is **consistent with climate mandates.**

We request a reallocation to Small-Scale Solar.



How much to reallocate

Fig 2. Annual Cumulative Enrollment in Small-Scale Solar

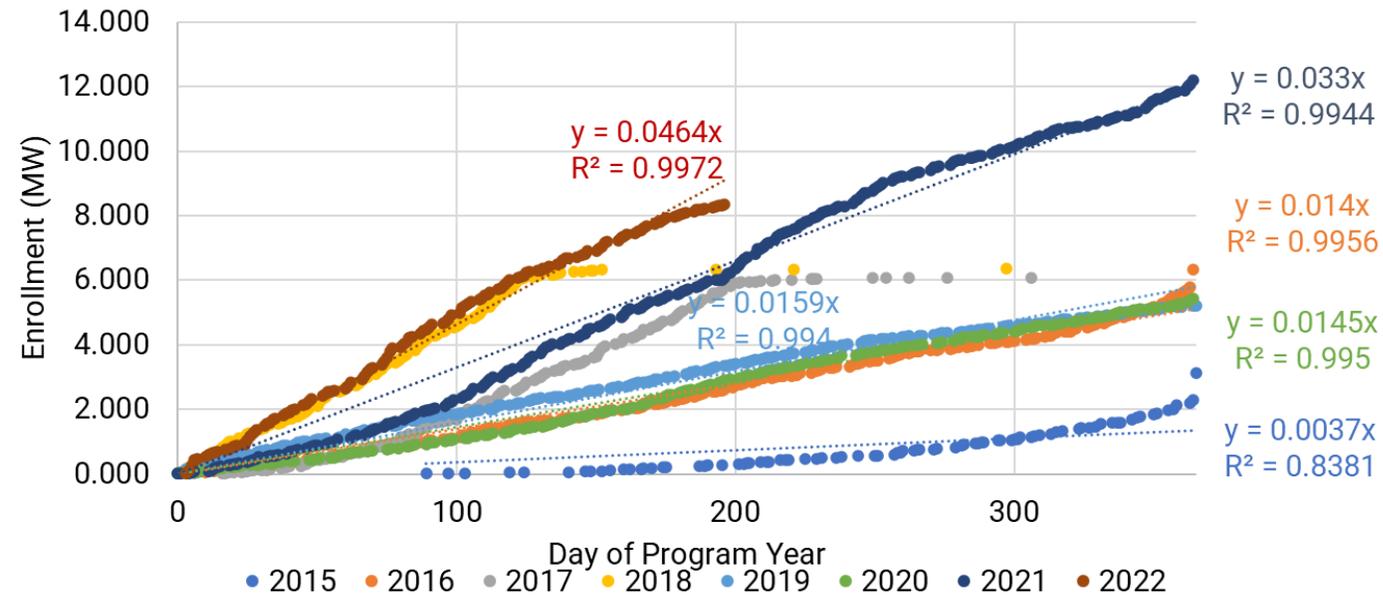


Notes: The YYYY REG Program Year is 4/1/YYYY-3/31/(YYYY+1). Data shown are by day of program year (DOPY), where 4/1/YYYY = 0. 2022 data are from 4/1/2022-10/14/2022. Enrollment is cumulative nameplate rating in MW DC. Trendlines are linear regression with y-intercept set to 0.00 (y is enrollment in MW and x is DOPY). Trendlines for 2017 and 2018 are not shown because allocation caps were enforced when fully subscribed, therefore a simple linear regression would be an inappropriate model for the data.



How much to reallocate

Fig 2. Annual Cumulative Enrollment in Small-Scale Solar



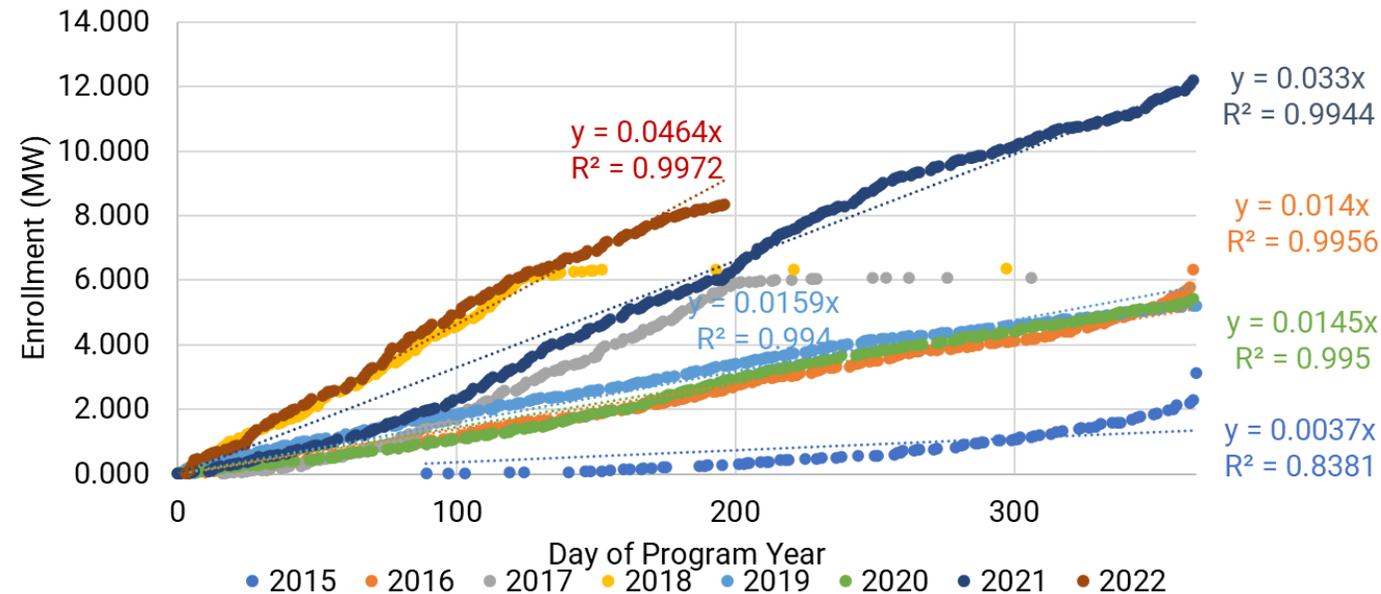
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Linear regression is a good fit model for the data.



How much to reallocate

Fig 2. Annual Cumulative Enrollment in Small-Scale Solar



We forecast 19.936 MW total potential enrollment in Small-Scale.

Accounting for existing allocation, we forecast a need to reallocate 8.43143 MW to Small-Scale.

Notes: The YYYY REG Program Year is 4/1/YYYY-3/31/(YYYY+1). Data shown are by day of program year (DOPY), where 4/1/YYYY = 0. 2022 data are from 4/1/2022-10/14/2022. Enrollment is cumulative nameplate rating in MW DC. Trendlines are linear regression with y-intercept set to 0.00 (y is enrollment in MW and x is DOPY). Trendlines for 2017 and 2018 are not shown because allocation caps were enforced when fully subscribed, therefore a simple linear regression would be an inappropriate model for the data. Forecast calculation is below, left. Reallocation calculation is below, right.

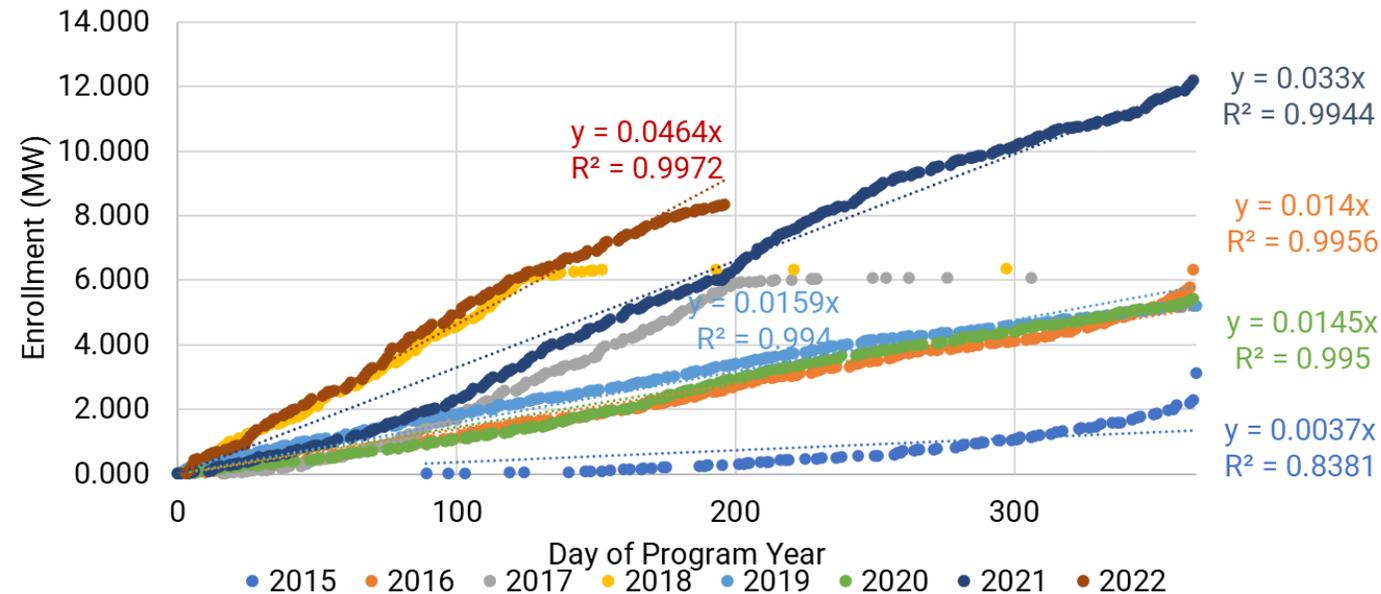
$y = 0.0464x$
Forecast = $0.0464 \text{ MW/day} * 365 \text{ days}$
Forecast = 16.936 MW

Reallocation = Forecast – Allocation
Reallocation = 16.936 MW – 8.50457 MW
Reallocation = 8.43143



How much to reallocate

Fig 2. Annual Cumulative Enrollment in Small-Scale Solar



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$y = 0.0464x$
Forecast = $0.0464 \text{ MW/day} * 365 \text{ days}$
Forecast = 16.936 MW

Reallocation = Forecast – Allocation
Reallocation = 16.936 MW – 8.50457 MW
Reallocation = 8.43143

Not reallocating 8.43143 MW will likely result in limited participation.



Tradeoffs between reallocation schedules

Assuming the full 8.43143 MW is needed:

One-Time Reallocation of 8.4 MW	Smaller Sequential Reallocations
Administratively efficient	Administratively less efficient
Sends strong market signal	Sends weaker market signal
Avoids potential contingent bids	Risk of potential contingent bids
More than doubles initial allocation, which may be perceived with skepticism	May be perceived as more cautionary approach
No downside risk of overallocation	No downside risk of overallocation, but overallocation may be less likely



Tradeoffs between reallocation schedules

Assuming the full 8.43143 MW is needed:

One-Time Reallocation of 8.4 MW	Smaller Sequential Reallocations
Administratively efficient	Administratively less efficient
Sends strong market signal	Sends weaker market signal
Avoids potential contingent bids	Risk of potential contingent bids
More than doubles initial allocation, which may be perceived with skepticism	May be perceived as more cautionary approach
No downside risk of overallocation	No downside risk of overallocation, but overallocation may be less likely

One-time reallocation may be preferable, but RIE defers to OER and the DG Board.

The Request



RIE hereby requests DG Board approval to reallocate 8.43143 MW unused capacity from larger classes to Small-Scale Solar, effective immediately.

Thank you for
your
consideration.

Contact



Carrie A. Gill, Ph.D.

Head of Electric Regulatory Strategy

External Affairs

Rhode Island Energy

cagill@rienergy.com

401-895-9282