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March 1, 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
Tariff and Rule Changes
Responses to PUC Record Requests**

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 the Company’s responses to the Public Utilities Commission’s Record Requests in the above-referenced docket. Please note that Record Request No. 1 was withdrawn by the Commission.

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

March 1, 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 2/6/2023

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The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 22-39-REG
In Re: 2023 Renewable Energy Growth Program Classes,
Ceiling Prices, and Capacity Targets and
2023 Renewable Energy Growth Program –
Tariffs and Solicitation and Enrollment Process Rules
Responses to Record Requests
Issued at the Commission’s Evidentiary Hearing
On February 8, 2023

Record Request 2

Request:

With respect to the Enrollment Rules, section 2.2.2 in Small Scale, and section 2.1.3 in Greater than 25 kW, does the Company believe there should be any tweaks to the language to avoid confusion from applicants when they are asked about what tax incentives they are planning to qualify for? If so, please provide proposed language. Please also explain the process by which the applicant will be expected to provide the information (portal fill-in box at the time of application, or something else).

Response:

The Company proposes the following changes to the “Rhode Island Renewable Energy Growth Program Solicitation and Enrollment Process Rules for Solar (Greater than 25kW), Wind, Hydro and Anaerobic Digester Projects” document:

“2.1.3 Application Completeness and Timeliness

Total Project Costs

Applications must include the estimated total project development costs. Applications that do not include the estimated total project development costs will be rejected. Total project development cost is defined as: “The expected all-in project capital cost, which should include all hardware, balance of plant, design, construction, permitting, interconnection, metering, development (including developer fee), interest during construction, financing costs and reserves. This figureThe total project costs should not include account for any tax incentives, grants, or other cash incentives, which maywill be requestedaccounted for separately. This figure should not include O&M expenses or replacement costs. All other upfront capital costs must be included.”

Record Request 2, Page 2

[Additional Application Requirements](#)

Applicants must endeavor to complete the entire application and provide all reasonably available information in each section of the application. Applicants will not be allowed to modify their applications after they are submitted to the Company.

~~Applications must include the estimated total project development costs. Applications that do not include the estimated total project development costs will be rejected. Total project development cost is defined as: “The expected all in project capital cost, which should include all hardware, balance of plant, design, construction, permitting, interconnection, metering, development (including developer fee), interest during construction, financing costs and reserves. This figure should not account for any tax incentives, grants, or other cash incentives, which will be accounted for separately. This figure should not include O&M expenses or replacement costs. All other upfront capital costs must be included.”~~

Applications must be timely submitted in accordance with the enrollment dates set forth in Schedule 5. Applications received after the deadline will not be accepted.

[Either through the Rhode Island Energy application process, or upon request by the Company during each open enrollment period, Applicants must provide information on whether the project intends to qualify for Federal Investment Tax Credits.](#)

Following the submission of applications, Rhode Island Energy may request additional information from Applicants at any time during the process. Applicants that do not respond to requests for information may be disqualified from an enrollment.”

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Further, the Company will endeavor to update the online application portal to explicitly require applicants to communicate if their projects intend to qualify for the Federal Investment Tax Credit offerings. If the changes cannot be made to the application portal prior to the commencement of the April 2023 Open Enrollment, the Rhode Island Energy team will contact each applicant outside of the portal process, during the 8-week application window, to request the required information to complete the application process.

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Record Request 3

Request:

In past, has the Company ever reallocated capacity to small scale solar? Has the Company previously waited until after 3rd open enrollment to reallocate to small solar? (See SEA testimony in Docket No. 4892 and the Order). Please provide the timing of when the capacity has been allocated from category to category in the prior years, indicating which classes were identified as over- and under-subscribed at the time of the deliberations and decisions and as much detail as is known about the timing relative to enrollments.

Response:

Yes, the Company has reallocated capacity to small scale solar in prior program years. Please see the table below for a history of reallocations, including amount of reallocation, reallocating to class, reallocating from class, subscription of other classes at time of reallocation, and timing relative to third open enrollment.

| Program Year | Reallocation to Class | Reallocated Amount | Reallocated from Class (under-subscribed class) | Date of Reallocation | Timing Relative to Third Open Enrollment |
|---------------------|------------------------------|---------------------------|---|-----------------------------|--|
| 2018 | Small-Scale Solar | 0.02300 MW | Under-subscribed Classes <i>(Hydropower, Anaerobic Digestion, Small Wind, CRDG Large-Scale Solar, and CRDG Commercial-Scale Solar; other classes</i> | 12/4/2018 | Remainder available after Third Open Enrollment complete |

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|---|-------------------|------------|--|------------|--|
| | | | <i>were fully subscribed)</i> | | |
| 2017 | Small-Scale Solar | 0.00700 MW | Under-subscribed Classes (<i>Hydropower, Anaerobic Digestion, Small Wind, Large-Scale Solar, and CRDG Commercial-Scale Solar; other classes were fully subscribed)</i>) | 12/5/2017 | Remainder available after Third Open Enrollment complete |
| 2016 | Small-Scale Solar | 1.65816 MW | Under-subscribed Classes (<i>Hydropower, Anaerobic Digestion, Wind, Medium-Scale Solar, Commercial-Scale Solar, and Large-Scale Solar)</i>) | 12/7/2016 | Remainder available after Third Open Enrollment complete |
| 2015 (<i>Note: only two Open Enrollments in PY2015)</i>) | Small-Scale Solar | 0.40836 MW | Under-subscribed Classes (<i>Hydropower, Anaerobic</i> | 11/24/2015 | Remainder available after Second Open |

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Record Request 3, Page 3

| | | | | | |
|--|--|--|--|--|------------------------|
| | | | <i>Digestion, Commercial- Scale Solar and Medium-Scale Solar; other classes were fully subscribed)</i> | | Enrollment complete |
|--|--|--|--|--|------------------------|

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Record Request 4

Request:

Did The Narragansett Electric Company’s role as a member of the DG Board allow it to participate in the initial proposed MW allocation in prior years? In other words, did the Company sit at the DG Board table during this decision as a voting or non-voting member and engage in the discussion, or did the Company abstain from these discussions?

Response:

In prior years, the Company engaged in discussions regarding the initial proposed MW allocation for the Renewable Energy Growth program as a non-voting member of the DG Board.